



Department
for Business
Innovation & Skills

HIGHER EDUCATION

**Disabled Students' Allowances:
Equality Analysis**

DECEMBER 2014

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Introduction

Equality Duty

1. Under the Equality Act 2010, the Department for Business, Innovation and Skills (BIS), as a public authority, is legally obliged to give due regard to equality issues when making policy decisions – the public sector equality duty, also called the general equality duty. Analysing the effects on equality of the decision to rebalance the funding available to students through the Disabled Students Allowances (DSAs) and institutional support, and in certain areas reduce the funding available through DSAs, through development of an equality impact assessment is one method of ensuring that thinking about equality issues is built into the policy process, and informs Ministers’ decision making.
2. BIS, as a public sector authority, must, in the exercise of its functions, have due regard to the need to:
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - Advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - Foster good relations between people who share a protected characteristic and those who do not.
3. The general equality duty covers the following protected characteristics: age, disability, gender, gender reassignment, pregnancy and maternity, race and sexual orientation. As disadvantage in higher education is still apparent in connection to family income and economic status, we will also look at the impact on individuals from lower income groups.
4. We will use the terms protected group and disadvantaged group, as well as low income backgrounds, and protected characteristics. Protected group is a reference to people with protected characteristics, and disadvantaged group refer to groups with low participation rates more widely.

UN Convention on the Rights of Persons with Disabilities

5. In undertaking this Equality Analysis, the Department has also taken into account the United Nations Convention on the Rights of Persons with Disabilities (“UNCRPD”) and in particular article 24(5) which states that parties to the Convention should ensure that persons with disabilities are able to access general tertiary education without discrimination and on an equal basis with others, and should in particular ensure that reasonable accommodation is provided to persons with disabilities.

Any queries about this Equality Analysis should be addressed to:

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Description of the policy

6. The Government provides student support to eligible students in higher education to meet tuition fee costs and to assist with living and other costs. The package of student support includes loans for tuition fees, maintenance loans and grants, and grants for students who are disabled (Disabled Students' Allowances) or who have dependents (Childcare Grant, Parents' Learning Allowance and Adult Dependants' Grant). The legislation dealing with the provision of student support to eligible students undertaking higher education courses is the Education (Student Support) Regulations 2011 (as amended).
7. The Disabled Students' Allowances (DSAs) are paid in respect of the 'additional expenditure' that a student is 'obliged to incur' to undertake a course of higher education because of a 'disability' to which they are subject. Disability in this context includes a long-term health condition, mental health condition or specific learning difficulty such as dyslexia. DSAs are paid in addition to the standard student support package. They are not means tested and do not have to be repaid.
8. DSAs are not intended to cover disability-related expenditure that the student would incur even if they were not attending a course of higher education, nor are they intended to cover study costs that any student might incur regardless of whether they are disabled.
9. Government spending on DSAs has increased annually. DSAs are being reviewed to ensure that support through DSAs is sustainable, is targeted effectively into the kinds of support that can make the most difference to students and value for money. Part of that review is to take account of the rapid technological advances in recent years and the more common ownership of equipment such as computers, tablets and smart phones. The focus will be to determine what are now truly 'additional' costs incurred by disabled students whilst studying on a higher education course.
10. The role of government policy in providing support for disabled students has also been reviewed in light of the specific duties placed on higher education institutions by the Equality Act 2010 ("the Equality Act").¹ There is a potential overlap between the specific duty placed on institutions to make reasonable adjustments under the Equality Act and the funding provided on an individual basis through DSAs. We are proposing changes to the DSAs funding support based on the expectation that higher education institutions will more consistently meet their obligations to provide reasonable adjustments. In turn this will lead to a more consistent DSAs offer, as students will no longer require increased DSAs support to address a lack of support from institutions. Extensive discussions have been undertaken with stakeholders between April and September 2014 to inform this impact analysis and to ensure that students' needs continue to be met.
11. Subsequent to the Equality Impact Assessment of proposed DSAs changes on 20 December 2013, further proposals have been developed to respond to the review of Government funding which identified the need to target DSAs funding more effectively. Further areas of DSAs funding are considered here. Alongside our review of Standard IT equipment and Accommodation costs, we are also reviewing the following areas:
 - Funding for higher cost IT equipment
 - Funding for peripheral IT equipment
 - Funding for IT consumables
 - Funding for textbooks

¹ <http://www.legislation.gov.uk/all?title=equality%20act%202010>

- Funding for Non-medical helper support
 - Funding for students with Specific Learning Difficulties (SpLDs)
 - Funding for human and technological support to meet a stated need
 - A requirement for organisations undertaking study needs assessments to register with an approved organisation in order to draw down DSAs funding
12. The definition of disabled for DSAs purposes was aligned to the Equality Act definition for 2014/15 and the impact analysis of that change is also included in this document for completeness.
13. In developing these proposals we have considered what should now be the correct balance between Government funding and what should be provided by institutions under their duty to make reasonable adjustments under the Equality Act. DSAs support will continue to provide funding towards equipment and support which we consider to be genuinely 'additional' and above and beyond what is a general cost for students or reasonable for a higher education institution to supply.

Background: Supporting disabled students to access higher education (HE)

Institutions providing higher education

14. For the purpose of this document the term 'institution' covers any institution which provides higher education courses which are designated for higher education student support purposes, including further education colleges providing higher education and alternative providers, unless otherwise indicated. Institutions providing higher education are autonomous bodies, independent from Government. They have legal responsibilities under the Equality Act 2010 to support disabled students, when they are both applying to higher education, and studying. Decisions about how to provide such support are matters for individual institutions.
15. Publicly funded institutions wanting to charge more than the basic fee level (£6,000 a year for full-time courses and £4,500 for part-time courses) need to agree access agreements with the independent Office for Fair Access. In access agreements, institutions set out what they will do to attract and retain disadvantaged students, including students with disabilities. This includes their targets and milestones for success.
16. Institutions are expected to have arrangements in place that can proactively meet the needs of disabled students and which can also be adapted to individual circumstances. The detailed decisions of how an institution will comply with legislation and more broadly support disabled students will be determined by the institution itself within the requirements of the law.
17. Most institutions have dedicated disability advisors in place who are responsible for organising the assessment and implementation of the support a student may need whilst studying, in order to get the most out of their time there. An ever increasing number of disabled people apply to study in higher education each year and the processes to support these students and make sure they have an excellent learning experience are well understood and recognised by institutions.

The Disability Premium

18. The government also provides annual funding to publicly funded institutions, through the Disability element of the Student Opportunity Funding of the HEFCE (Higher Education Funding Council for England) grant, to help them recruit and support disabled students. This funding rose to £15 million

for 2013/14, an increase of £2 million on the previous year. That funding has been maintained in 2014/15.

Disabled Students' Allowances

19. Published figures show that in 2012/13 56,600 full-time undergraduate students received DSAs totalling £127.6m, 3,000 part-time undergraduates received £7.3m and 4,900 post-graduate students received £10.9m: a total DSAs spend of £145.8m². Expenditure on DSAs has increased year on year.
20. A table showing the different allowance rates is at Annex 3.

Alternative providers

21. Alternative providers of higher education courses do not receive a Disability Premium as they do not receive public funding for the provision of higher education courses. Nor are alternative providers of higher education subject to Part 6 of the Equality Act which specifically covers Universities funded under section 65 of the Further and Higher Education Act 1992, Higher Education Corporations and institutions designated under Part 2 of 1992 Act. They are however covered by Part 3 of the Equality Act as a service provider and therefore likewise have a duty to make reasonable adjustments in respect of disabled persons.

The duty to make reasonable adjustments

22. Many of the proposed changes are based on the principle that institutions have duties to make reasonable adjustments for disabled students. The duties are set out in legislation. In the case of England, Scotland and Wales the relevant legislation is the Equality Act 2010 ("the Equality Act"). For Northern Ireland the relevant legislation is the Disability Discrimination Act 1995 ("the 1995 Act") and the Special Education Needs and Disability (Northern Ireland) Order 2005 ("the 2005 Order").
23. The duty to make reasonable adjustments comprises three requirements:
 - where a provision, criterion or practices puts disabled persons at a substantial disadvantage compared with those who are not disabled, there is a requirement to take reasonable steps to avoid that disadvantage;
 - where a physical feature puts disabled persons at a substantial disadvantage compared with persons who are not disabled, there is a requirement to take reasonable steps to avoid that disadvantage; and
 - where not providing an auxiliary aid or service puts disabled students at a substantial disadvantage compared with students who are not disabled, there is a requirement to take reasonable steps to provide that auxiliary aid or service.³
24. The duty to make reasonable adjustments applies to various types of persons and in particular:
 - responsible bodies for "Higher Education Institutions"⁴ in England, Scotland and Wales, and "Educational Institutions"⁵ in Northern Ireland (referred to collectively in this section as "HEIs");

² Statistical first release – 27 November 2014

³ Section 20 of the Equality Act.

⁴ Part 6 of the Equality Act.

- service providers⁶; and
 - persons letting, managing or disposing of premises⁷.
25. The relevant parts of the legislation which apply to service providers would cover institutions providing higher education which are not HEIs. Providers of student accommodation might fall within the provisions dealing with HEIs, service providers or landlords depending on who the accommodation was being provided by and the circumstances in which it was being provided.
26. The nature and extent of the duty varies depending on the person to whom the duty applies. The main difference is that persons letting, managing or disposing of premises do not have a duty to make reasonable adjustments to physical features of their premises.⁸ By contrast, HEIs and service providers must comply with all three requirements.⁹ In addition, the duty insofar as it applies to persons letting premises etc. only arises following a request made by a disabled person.¹⁰ In relation to HEIs and service providers the duty is anticipatory: they must proactively consider addressing any barriers which might impede disabled students from accessing the benefits, facilities and services which they offer.¹¹
27. The duty to make reasonable adjustments requires institutions to take reasonable steps to address barriers which put disabled students at a substantial disadvantage. Whether a particular step is reasonable will depend on the circumstances. A number of factors will be relevant including the effectiveness of the adjustment, the practicability of the adjustment, the impact on the student and others, the cost of the adjustment and the size and resources of the institution.
28. We expect that in most cases institutions will have a duty to meet the additional cost of accommodation, aids and services which are no longer being met by DSAs. We do though accept that there is a risk institutions may take a different view of what those duties might look like, or might simply fail to meet their duties. The impact of that risk is that disabled students may find themselves without the appropriate support from institutions and at the same time find DSAs are no longer available. The result of that might be that students fail to achieve the outcome they are capable of, withdraw from their course or decide not to enrol for study at all.
29. Whilst the risk of institutions failing to discharge their duties has been recognised, we are unable to quantify the extent of that risk. Engagement with institutions' sector representative bodies and individual institutions has not resulted in specific evidence that the duty to provide reasonable adjustments will not be met. However, a few stakeholders have raised concerns that the timescale within which to implement the changes is challenging and that shifting too great a burden onto institutions might leave smaller and more specialist institutions unable to make full provision for the learning needs of their disabled students. Other institutions have provided examples of work they are undertaking to ensure they do discharge their duties effectively. Concerns have however been raised about the burden on those institutions with a large disabled student body and how funding streams might be altered to take account of that.

⁵ Part 3 of the 2005 Order.

⁶ Part 3 of the Equality Act; Part 3 of the 1995 Act.

⁷ Part 4 of the Equality Act; sections 22 to 24L of the 1995 Act.

⁸ Schedule 4 to the Equality Act; section 24E of the 1995 Act.

⁹ Parts 3 and 6 of the Equality Act; Part 3 of the 1995 Act and the 2005 Order.

¹⁰ Schedule 4 to the Equality Act; sections 24C and 24D of the 1995 Act.

¹¹ Although note that in Northern Ireland, there is a limited exception where the institution could not have been reasonably expected to know that the student was disabled, see article 29 of the 2005 Order.

30. Whilst the removal of DSAs funding will be replaced by institutional support in some circumstances, either on a like for like basis or through alternative ways of delivering support, some institutions may determine that they are unable to provide the appropriate support. The student will have two avenues of redress. First, the student can appeal against the institution's decision that an adjustment is not reasonable. Ultimately that appeal can go to the Office of the Independent Adjudicator for higher education www.oia.org.uk. The higher education sector is being asked to improve the process for students wishing to make such an appeal.
31. Second, the DSAs system will have an Exceptional Case Process in place. DSAs study needs assessors may request SFE to consider awarding DSAs funding where it would not ordinarily be available, for example where there is an expectation of institutional support through a reasonable adjustment. However, it will not be the place of this process to replace reasonable adjustments in the longer term and discussions would be undertaken with the institution to determine what action will be taken to improve the support available through reasonable adjustments. The Exceptional Case Process cannot be used for support that is specifically prohibited under the regulations.
32. Monitoring the Exceptional Case Process will enable BIS to consider institutions' performance in relation to the provision of reasonable adjustments and indicate where BIS expectations are not being met, and whether this is due to different interpretation of the legal duty, resourcing issues or practical delivery issues.

Policy proposals

Funding for computers

33. DSAs are intended to meet the 'additional expenditure' which a student is 'obliged to incur' to undertake a course of higher education because of a 'disability' to which they are subject. Additional in this context means the costs that a disabled student incurs as a result of their impairment which are over and above that which non-disabled students would be expected to incur. After over 20 years of DSAs provision, the extent to which computers are an 'additional' expense for disabled students is being reviewed.
34. When DSAs were first introduced in 1990, ownership of computers was not commonplace. Students were not expected to submit coursework electronically, traditional methods were used to deliver lectures and materials were often provided in hard copy. The last 20 years has seen a rapid advance in the availability and capacity of modern technology. Technological advances have led to those devices becoming cheaper and more powerful.
35. Institutions have also radically altered the way information is delivered to students and the way in which they expect students' work to be submitted. The use of virtual learning environments in institutions has changed the way in which students can access information and has made learning more accessible for those who may need to study away from the institution for whatever reason. The change in the way information is delivered has developed hand-in-hand with the different ways students prefer to access information. Computers and other mobile devices can be used to interact with lectures. Hand-outs and notes can easily be uploaded on to these devices.

36. Surveys by Ofcom point to a significant change in the technological environment in the last decade with laptop ownership amongst households in particular growing significantly in recent years. In 2013 two thirds of adults (66%) had a laptop in their household with ownership highest for those aged between 16 and 44 (over 7 in 10)¹². More specifically, research by some HE institutions and the NUS suggests that the majority of current students now own a laptop. These studies put laptop ownership at three quarters of students or higher, although research evidence also shows that not all these are new with around a third of students (34%) using a device which is between three and five years old¹³.
37. Despite the more common ownership of electronic devices and the innovative ways institutions provide information to their student body, it is common for DSAs to be recommended to fund computers which many students use day-to-day. Recent advances in technology mean that entry-level computers are now able to run a range of assistive software packages. DSAs-funded 'standard' computers are generally of a higher specification compared to entry level computers to ensure multiple assistive software programmes can run effectively. Assistive software refers here to software products that have been developed to enable disabled people to access information e.g. speech to text software. An SLC sampling exercise of DSAs students found that 75% had received a standard specification computer, sometimes referred to as a 'classic' or 'workhorse' computer by the DSAs sector.
38. The Equality Act has also been introduced which imposes a duty on institutions to make reasonable adjustments for HE students. It is our view that this duty is engaged irrespective of whether a student may qualify for DSAs or not.
39. In 2013, BIS ran a call for evidence on targeted support and the question was raised as to the types of equipment to which students would ordinarily be expected to have access (either via the institution or through owning themselves). Over 140 responses were received from a wide range of stakeholders, including student unions, suppliers of assistive technology, study needs assessment centres, HE disability staff and dyslexia specialists (list of respondents not included here for confidentiality reasons).
40. Many respondents referred to research on disabled students in higher education and the beneficial effects of DSAs on the participation, retention and outcomes of disabled students in higher education. Responses indicated that students are now expected to submit course work electronically. However, the point was also raised that universities often do not provide sufficient communal facilities with the right sort of equipment to enable disabled students to easily access the appropriate equipment for their needs, and also that some students would find it particularly difficult to access communal computer facilities because of their specific impairment.
41. There are many examples of excellent provision within universities for disabled students, but it is likely that some universities are still working towards full provision and the wide availability of personal support through DSAs for students may have removed the urgency of improving the provision of fully

¹² Ofcom communications tracking survey <http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-13/3-takeup.pdf>

¹³ For example research by the NUS Degrees of discrimination <http://www.nusconnect.org.uk/asset/News/6040/Degreesofdiscrimination-researchbrief.pdf>
 University of Sheffield student mobile device survey 2011
https://www.sheffield.ac.uk/polopoly_fs/1.103665!/file/mobilesurvey2011.pdf
 Sonja Grussendorf, *Device Ownership, 'BYOD' & Social Media For Learning* (LSE, 2013)
http://eprints.lse.ac.uk/51652/1/IMT_survey_2013.pdf

accessible communal IT facilities. A survey by the National Association of Disability Practitioners found variable provision of communal IT across institutions (see table 8, page 29).

42. We have considered a range of options relating to the provision of computers through DSAs. These range from continuing to provide computers to the vast majority of DSA students, down to providing no computers at all.
43. Continuing to provide computers at the current level raises issues of value for money. Buying individual computers rather than improving the provision of communal access is not cost effective. Bulk-buying computer equipment centrally could be an option, but would not address the issue of the continued provision of equipment which is now largely regarded as commonplace.
44. We believe that some students will continue to need personal access to higher specification equipment that non-disabled students would not need in the same circumstances. We believe however that entry-level specification computers are no longer an 'additional' cost and propose that these are no longer funded through DSAs. We further propose that where students require a higher specification computer because of their disability, they should contribute to the cost to the equivalent of an entry-level computer.

Funding for IT peripherals

45. There are a number of items of equipment that are routinely supplied to disabled students as a package that accompanies a computer (desktop or laptop). The equipment is supplied irrespective of the specific needs of the student and will, in a considerable number of cases, be unrelated to their specific disability or needs. For example **all** students that receive a computer via DSAs receive a standard bundle of non-specialist items, irrespective of needs, which includes amongst other things a carry case, riser stand, extension lead and USB hub. In addition 79% of DSA students receive a digital voice recorder to record lecture and seminars. Research undertaken by specialists in the sector found that only around two thirds of students receiving the voice recorder found it useful in their studies¹⁴. This additional cost to Government represents questionable value for money and will no longer be funded through DSAs as a matter of course. We propose that some items will still be funded through DSAs where a specific disability-related need is fully evidenced and justified.
46. Further equipment is regularly provided to students where its use is linked to the provision of computer equipment e.g. printers and scanners. Currently 57% of DSA students receive a device which has both printing and scanning functions. 20% of students receive a standalone printer and most of these students also receive a standalone scanner. There are a variety of ways in which the need for individual hard copy or scanned materials can be reduced, including the provision of alternative format publications and long library loans. Institutions' printing services also have a role here. We propose that such equipment will no longer be routinely funded through DSAs, unless alternatives are not possible.

¹⁴ *Review of technology-based support to reduce the impact of note-taking difficulties on disabled students*. Abi James & EA Draffan, June 2014.

Funding for IT consumables

47. The consequential effect of the removal of funding for personal printers and hard copy materials will reduce the expectation of a personal allowance for printing costs. The expectation of improved library services extends to printing and scanning services where required by disabled students.
48. It is proposed that students will no longer be recommended a consumables allowance and that alternative ways of meeting the need for printed documents is considered by the institution in the first instance.

Funding for textbooks

49. The general allowance of DSAs provides funding for miscellaneous expenditure which is not covered by other allowances. Over time there has become an expectation that students will receive a standard amount that they can use to buy books and other items. This amount has settled at around £250-£300 per academic year. Books that are listed as essential reading for the course are not generally funded, as all students would be expected to have access to, or buy, those books. However, non-essential books have become a standard item of funding for disabled students, irrespective of whether a specific need to purchase a book has been identified. This position is not consistent with the expressed purpose of DSAs.
50. The available evidence suggests that the additional funding currently being awarded to disabled students to buy books and other general consumables significantly exceeds the amount spent by the average student and is more than the amount spent by those students who achieve a first class degree. The most recent Student Income and Expenditure Survey of English domiciled students shows that full time first year students spent in 2011/12 an average of £128 on books alone¹⁵. More specifically, research at the University of East London tracked the expenditure of almost 5,500 undergraduates at its campus bookshops over the three years of their studies. Students who gained a first-class degree spent an average of £239 on books - almost two-thirds more than the £146 spent by those who later received a third-class degree. Students who received an upper second spent £205 on books, while those getting a 2:2 spent £179.
51. It is our view that the purchase of books is a cost which the generality of students expect to meet and that this should be no different for disabled students. Furthermore students regularly draw on a range of information that is wider than the reading list provided to them. Internet resources and HEI library resources are readily available to support higher education learning. In the current learning environment the purchase of additional books will not always be necessary.
52. There are many reasons why a student would wish to purchase a book for their sole use. They may need to have access to a book for a longer period than is ordinarily offered by their library or they may need access in a different format. However, we believe the need for individual book purchases has diminished and that institutions are better placed to provide support where that need still exists, for example through arranging alternative format books, or where a hard copy book is needed, through arranging long loans through the library.

¹⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/209389/bis-13-P190-student-income-expenditure-survey-2011-12.pdf

53. Non-essential textbooks will no longer be routinely funded through DSAs. Institutions can respond to individual needs in a range of ways that would enable appropriate access to academic resources for disabled students. Library loan systems can be adapted to take into account the individual needs of disabled students, including the provision of longer loan periods. Access to online resources can be arranged, including in alternative formats. Many publishers have agreed to make alternative formats of their publications available to disabled students, online and at no cost. We wish to see this facility used widely and routinely.

Accommodation

54. DSAs funding is often requested to cover the additional costs of accommodation that arise due to the student's disability. Most commonly this relates to a student's request for en-suite accommodation.
55. We have considered the specific duty under the Equality Act that is placed on institutions who provide accommodation, and their agents. In particular we have considered whether the additional costs of accommodation for disabled students, including access to en-suite accommodation, are something which institutions should consider meeting as a reasonable adjustment.
56. Some modifications to accommodation will be part of the care package arranged by the student's local authority and fall outside the scope of this document, as the cost of such modifications remain with the local authority under their continuing duties under the Care Act 2014.
57. It is our view that the extra costs associated with the provision of appropriate accommodation for disabled students does engage the Equality Act, and having done so, any extra charge related to that accommodation cannot be passed on to the student. Some costs will be covered by the local authority as part of the student's personal care package, but some costs may fall outside of that, for example where the student does not have a personal care package in place, but nevertheless requires a particular type of accommodation.
58. Once the Equality Act is engaged, we are of the view that DSAs should not be provided in order to fund the additional cost and therefore propose that DSAs will no longer be provided in such cases. We intend that this should apply to accommodation provided by institutions or their agents.
59. DSAs funding will only be available to provide funding towards the additional costs of accommodation which is not provided by the student's institution or its agent.

Non-Medical Help (NMH) support

60. We have considered the financial accountability of the provision of non-medical help and the type of support that is funded through the Non-Medical Help allowance. It is estimated that around £65m was spent on providing Non-Medical Help support to full-time and part-time undergraduate and postgraduate students in 2011/12.
61. The term Non-Medical Help covers a wide range of functions, from taking notes on behalf of a student and helping students to access libraries and laboratories to providing more specialist support e.g. British Sign Language interpreters. DSAs funding currently covers the full range of services that can be classed as Non-Medical Help, up to the maximum amount that can be paid to an individual student. NMH is also delivered in a variety of ways. Some institutions provide Non-Medical Help support through in-house teams of staff, others have entered into arrangements with single Non-Medical Help provider organisations and some leave the identification and selection of Non-Medical Help support staff to the DSAs study needs assessors.
62. The Equality Act imposes a duty on institutions to take reasonable steps to provide auxiliary aids or services where not doing so would put disabled students at a substantial disadvantage compared with

students who are not disabled. We have considered what this duty might mean and how that duty might be viewed in relation to the provision of DSAs.

63. We recognise that many students require very specialist help or a range of help, as they have a high level of support requirements, for example where they have more than one impairment. However, there are many students whose requirements might demand a much lower level of response. Some students may be sufficiently assisted simply by changing the way in which course materials are delivered or improvements in the accessibility of resources, for example improved library services or the provision of electronic books could remove the need for students to scan or purchase their own hard copies of books. The provision of accessible computer rooms, including quiet rooms, could remove the need for students to work away from the institution. Some students may find that the provision of assistive technology could remove the need for human support and enable independent, autonomous learning, for example recording devices and lecture capture technologies could remove the need for an individual note-taker.
64. Institutions are best placed to determine how courses might be best delivered to ensure that the majority of students can access the course without the need for specialist, individual support. We expect institutions to work towards providing inclusive methods of providing information and support, so that all students can easily access their course. We also expect institutions to provide any individual lower level support needed by disabled students. To this end, we propose that DSAs funding support is targeted at those students with the need for more specialist support and have identified a number of types of support that will no longer be ordinarily funded through DSAs.
65. We propose that the following areas of support will no longer be ordinarily considered for DSAs funding from 2016/17, these are generic terms but will also cover support where other descriptive terms are used, but the support is essentially the same:
 - Practical Support Assistant
 - Library Support Assistant
 - Reader
 - Scribe
 - Workshop/Laboratory Assistant
 - Proof Reader
 - Study Assistant
 - Examination Support Worker
 - Manual Note-takers
 - Transcription services

Support for students with Specific Learning Difficulties (SpLDs)

66. The term Specific Learning Difficulties covers a range of conditions, including dyslexia, dyscalculia and dyspraxia. Students are required to have a post-16 diagnostic assessment of Specific Learning Difficulties before being eligible to apply for DSAs. Diagnostic assessments for DSAs purposes are carried out by specialist teachers or practitioner psychologists with an appropriate qualification. A diagnostic assessment uses a range of tools to determine the specific strengths and weaknesses of the student and, where it is the first assessment, to conclude if a Specific Learning Difficulty exists.
67. The tools used in the diagnostic assessment indicate the level of the student's impairment. Diagnostic tests score the student's skills and abilities relative to the standards in the general population and also against the student's underlying ability. Scores may suggest an element of impairment ranging from mild to severe. Funding through DSAs is currently available to support students presenting with all levels of Specific Learning Difficulty, including for impairments that are very mild.

68. The prevalence of Specific Learning Difficulties in the UK domiciled student population has been fairly constant over the last decade and is estimated to be higher than in the general population. The comparatively high incidence of higher education students with dyslexia in particular suggests that all institutions are likely to offer places to students with dyslexia and that some form of adjustment to course materials and course delivery may therefore be expected. Furthermore, as shown by the Higher Education Statistics Agency (HESA) statistics for the sector, students with Specific Learning Difficulties constitute just under half of the HE population that declare a disability, the largest disability group that institutions' provision needs to accommodate.
69. We propose that DSAs funding remains available to students presenting with moderate to severe levels of Specific Learning Difficulties, as evidence by the range of tests, and that institutions make sufficient anticipatory and individual reasonable adjustments to meet the needs of their students presenting with a mild Specific Learning Difficulty.
70. Consultation with stakeholders on this proposal has highlighted that the complexity of a student's Specific Learning Difficulty is related primarily to the impact of the learning environment, rather than the severity of the impairment. Whilst it is the case that inclusive learning environments and anticipatory reasonable adjustments will remove the reliance on DSAs for some students with a Specific Learning Difficulty, this is unlikely to relate to the severity of their learning difficulty. Therefore, for the purposes of these reforms, students with Specific Learning Difficulties are assumed to be part of the wider disabled student body that will be affected by the Non-Medical help proposal and will not be treated as a distinct group.

Funding for human and technological support to meet an identified need

71. The rapid evolution of technology has had a positive impact on disabled people, including those wishing to study at higher education level. The range of assistive technology developed to support independent learning continues to expand and has helped students overcome a range of difficulties.
72. We firmly believe that the role of higher education is to develop independent, autonomous learning and thinking, and our aspirations for disabled students are no less. The provision of assistive technology can support the aim of independent learning and we will continue to fund assistive technology where it has been identified as being required to address a particular need.
73. We expect the reliance on human (Non-Medical Help) support to reduce in many cases and will no longer provide DSAs funding for Non-Medical Help support where assistive technology has been provided to meet the same need. For example, we would not ordinarily expect a student to receive funding for a note-taker, if assistive technology has been provided to record the contents of a lecture.

Registration of organisations drawing down DSAs funding

74. The quality of service for disabled students is a priority. The requirement for organisations delivering a DSAs study needs assessment service to be registered with a body approved by the Secretary of State is being proposed as part of wider work to improve the quality assurance of assessments and assessment centres and to provide more consistent services for students.
75. We will introduce arrangements whereby centres are assessed against published criteria as part of the decision as to whether they can continue to be registered for DSAs funding purposes. Students are currently assessed for DSAs by study needs assessors, who are audited by a membership body – the Disabled Students' Allowances Quality Assurance Group (DSA-QAG). Assistive Technology Service Providers are also members of, and audited by, DSA-QAG.
76. We propose that from 2015 DSAs study needs assessment centres and assistive technology service providers should be required to be registered with an approved body in order to be able to undertake

DSA services. This will ensure that assessment centres cannot opt out of the arrangements in place for ensuring a consistent and quality service for students.

Definition of disability

77. The student support regulations provide support for disabled students in the form of Disabled Students Allowances (DSAs), but have not defined who should be treated as disabled in that context. This has caused a tension between the support that institutions provided for disabled students and the support provided through DSAs, as there has been a lack of clarity on who fell within the scope of support and who did not.
78. From 2014/15 disability is defined in relation to the definition provided by the Equality Act 2010, for the purposes of receiving DSAs.
79. This could have an effect on students who may have been provided with DSAs but who do not meet the definition of disabled within the Equality Act 2010. The intention is that this change will only be applied to new students, or existing students who have not made a prior claim to DSAs. Continuing DSA recipients will continue to receive the same level of support in 2015/16.

The Evidence Base

Introduction

80. For this equality analysis the primary sources of data are:

- HESA student record data for all UK domiciled students at UK institutions¹⁶.
- Student Loan Company (SLC) data on the characteristics of English domiciled DSAs recipients studying at UK institutions;
- Wider research undertaken by stakeholders and other organisations (listed in Annex 4).

81. These data sources allow us to examine the recent trends in higher education participation by students with disabilities and identify any potential impacts of the policy changes on disabled students and other groups with protected characteristics of age, ethnicity and gender. We do not have specific evidence relating to gender reassignment, pregnancy and maternity, sexual orientation and religion or belief, as data has not been collected on these groups previously. As disadvantage for those accessing higher education remains evident in higher education for those from low income households, this analysis also considers the impact of policy changes on students from less advantaged backgrounds.

82. Our analysis of the evidence base is structured as follows:

- The evidence base first reviews the participation of UK domiciled people with disabilities at UK publicly-funded institutions and their educational and labour market outcomes;
- Secondly it sets out the trends in DSAs expenditure and the pattern of current expenditure. It also sets out evidence on publicly-funded institutions' own expenditure on access and student success for their disabled student populations;
- Thirdly it examines the characteristics of current recipients of DSAs compared to the wider student population to ascertain whether other protected groups are over represented in the DSAs recipient group. Where possible, the evidence considers the characteristics of students that would be affected by each element of the DSAs policy change. Only English domiciled students studying at UK institutions are eligible for DSAs through the English student support arrangements. The devolved administrations offer their own package of DSAs support; and
- Finally it examines the available evidence on the potential impact of the DSAs policy changes on those students eligible for DSAs. This includes considering the extent to which computer/laptop/tablet ownership is common amongst students and part of the modern higher education teaching environment, the extent to which financial support affects the decision to participate in higher education and once in higher education the financial position of disabled students compared to non-disabled students.

¹⁶ HESA data on protected characteristics is self-reported. The numbers of disabled students are derived from information in the student record where students declare they have a disability. This number will differ from the numbers of students having their disability assessed and awarded for DSAs purposes.

Participation in Higher Education

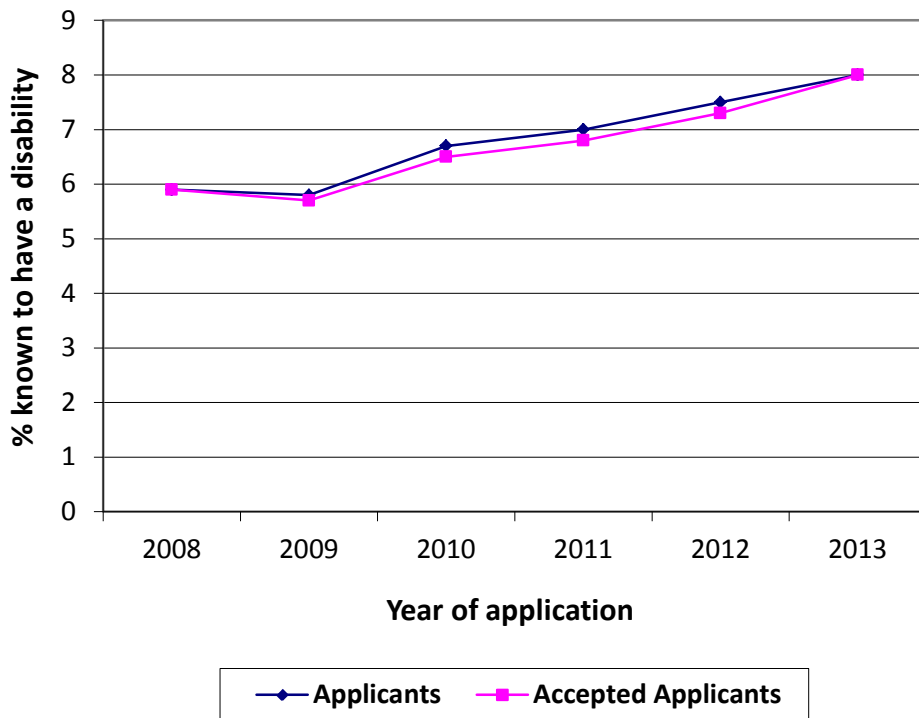
Summary

- The proportion of the UK domiciled entrants with a declared disability has been rising in recent years.
- Almost half (47%) of disabled UK-domiciled undergraduate entrants in 2012/13 reported a Specific Learning Difficulty (SpLD).
- Students with known disabilities are more likely to study creative arts and design courses than their non-disabled peers.
- Institutions with the highest proportion of DSAs-eligible students tend to be small and specialist institutions, particularly those offering creative and land-based subjects.
- A small number of institutions have between one fifth and one quarter of their students reporting a specific learning difficulty.
- Evidence shows that students with a declared disability are more likely to continue their studies, i.e. not drop-out, than their non-disabled peers.
- Evidence suggests that DSAs are supporting student success and that DSAs recipients out-perform non-disabled students once other factors that affect educational outcomes are taken into account.
- However it is not possible to say which elements of DSAs support (travel, general, non-medical help or equipment) delivers the most effective support for students.

Trends in participation

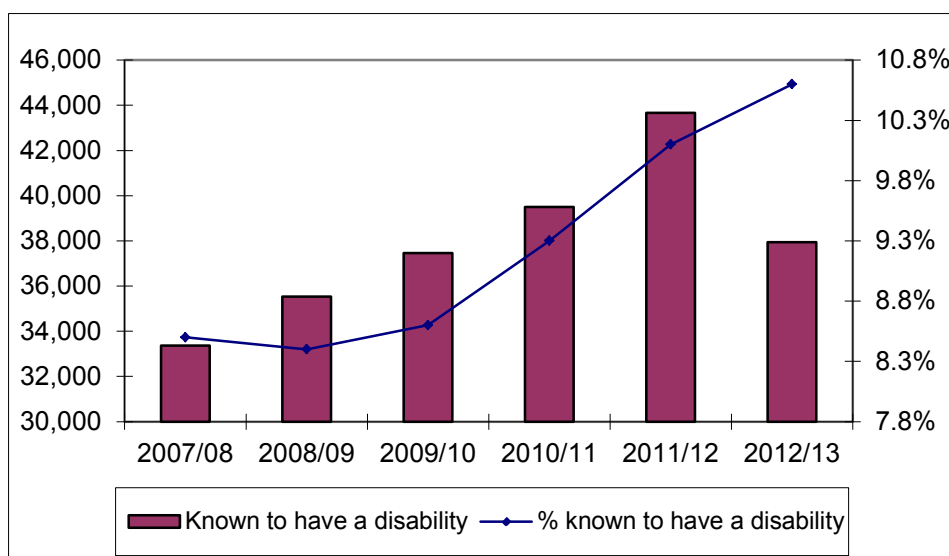
83. Overall HESA student record data points to diminishing inequalities in higher education and improved representation from some previously under-represented groups (see Annex 1). Evidence about participation in higher education seems to indicate that there is good representation from protected and disadvantaged groups such as females and minority ethnic communities; the proportion of students declaring a disability has increased; and the proportion of young people living in the most disadvantaged areas who enter higher education has increased. These groups have traditionally been under-represented in higher education.
84. More specifically with regards to people with disabilities, UCAS data shows that the proportion of university applicants who have a self-reported declared disability has risen gradually between 2008 and 2013 (Chart 1). HESA data shows that the proportion of UK domiciled higher education entrants who have a disability has risen steadily in the past five years (Chart 2).
85. In terms of subject area, disabled students (and the sub group awarded DSAs) are just as likely as their non-disabled counterparts to study STEM subjects. Previous analysis of 2010/11 HESA data showed that 40.6% of disabled students and 42.7% of DSAs recipients studied STEM subjects, compared with 41.7% of non-disabled students. Students with known disabilities are more likely to study creative arts and design courses, 14.7% of disabled students (16.4% of DSAs students), compared with just 6.5% of non-disabled students. Disabled students were most under-represented in business and administrative studies: 8.2% of them (7.4% of DSAs recipients) compared with 14.9% of non-disabled students.

Chart 1: Proportion of UK full-time undergraduate student applicants and accepted applicants who have declared a disability, by year of application cycle



Source: UCAS, Annual reference tables: Disability (UK)

Chart 2: UK domiciled first year full-time undergraduate entrants to UK institutions known to have a disability



Source: HESA Table 14

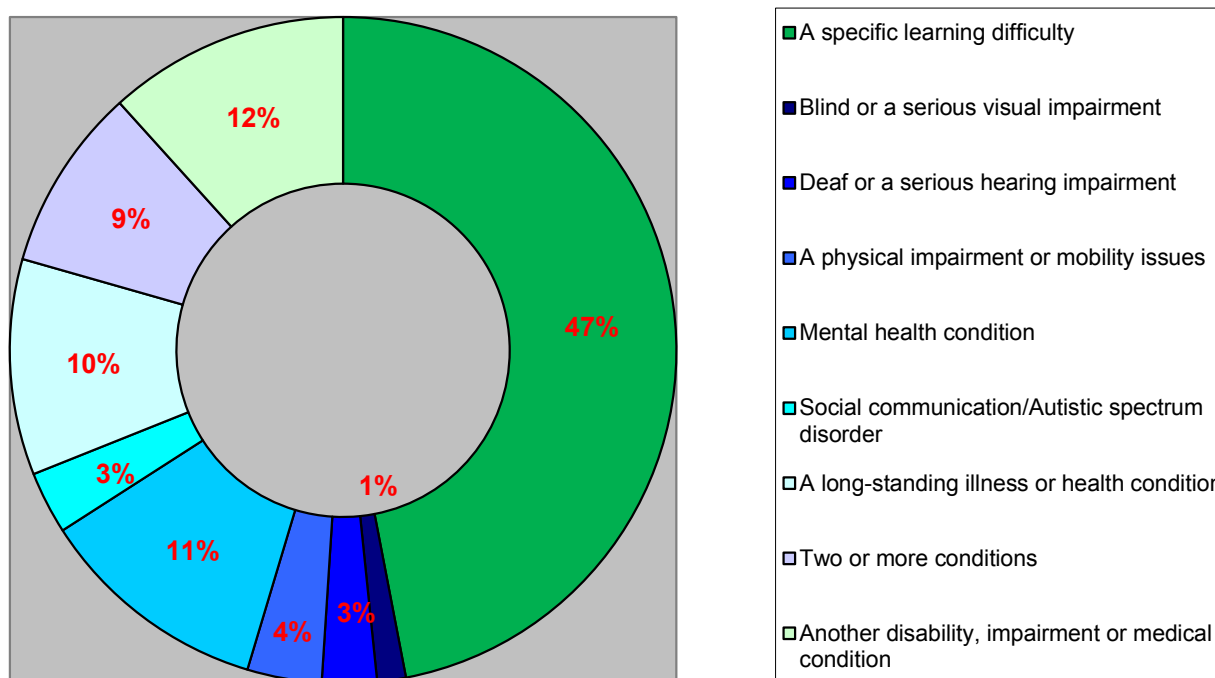
Type of disability

86. Almost half (47%) of disabled UK-domiciled undergraduate entrants in 2012/13 reported their condition as being a specific learning difficulty. Around one in ten (10.2%) reported a long-standing illness or health condition, and around one in ten (9.5%) a mental health condition. Other conditions or combinations of conditions were less common (see Chart 3).

Specific Learning Difficulties

87. The prevalence of Specific Learning Difficulties (SpLD) in the UK domiciled student population is estimated by HESA to be around 6% for full time undergraduate entrants in 2012/13 and 3% for part time entrants. Students with a SpLD represent just under half (47%) of all UK domiciled undergraduate entrants declaring a disability. Earlier HESA data only collected information on the prevalence of dyslexia, not other Specific Learning Difficulties. This data shows that the incidence of dyslexia alone amongst the full time undergraduate entrants was 3% in 2002/03, rising to 4% in 2006/07. Although not strictly comparable data, the HESA time series seems to suggest that the incidence of Specific Learning Difficulties in the undergraduate population has at least remained constant over the last decade.

Chart 3: UK-domiciled undergraduate disabled entrants to UK higher education by type of disability



Source: HESA Table 14 - First year UK domiciled higher education students by level of study, gender, mode of study and disability 2012/13

Institutional variation in DSAs eligibility

88. Figures collated by GuildHE indicate that there is wide variation in the proportion of students at each UK institution who are eligible for DSAs institutions (Table 1). The institutions with the highest proportion of DSAs-eligible students tend to be small and specialist institutions, particularly those offering creative and land-based subjects.

Table 1: 25 UK institutions with largest proportion of full time, first degree students in receipt of DSAs, 2012/13

Institution	Percentage of students in receipt of DSAs (%)
Total UK	6.5
Falmouth University	30.2
The Liverpool Institute for Performing Arts	24.5
Central School of Speech and Drama	23.8
University of the Arts, London	23.8
Glyndŵr University	23
Guildhall School of Music and Drama	20.3
Royal Agricultural University	19.9
Harper Adams University	18.3
The Royal Veterinary College	18
Glasgow School of Art	17.3
Trinity Laban Conservatoire of Music and Dance	16.6
Norwich University of the Arts	16.4
University for the Creative Arts	16.2
Leeds College of Art	15.3
Rose Bruford College	15.3
Conservatoire for Dance and Drama	13.5
University of St Mark and St John	13.1
Royal Northern College of Music	13
Royal Conservatoire of Scotland	12.8
The University of Winchester	12.1
University of Wales Trinity Saint David	11.9
Bath Spa University	11.7
The University of Chichester	11.3
The Arts University Bournemouth	11
Newman University	11

Source: GuildHE analysis of HESA data (submitted to BIS)

89. The GuildHE analysis of DSAs recipients by institution identified four institutions where the proportion of students with a reported Specific Learning Difficulties was between 20-25% of all students (Table 2).

Table 2: 25 UK institutions with largest proportion of students with a Specific Learning Difficulty, 2012/13

Institution	Percentage of students with SpLD (%)
Total UK	4.6
Leeds College of Art	25
Falmouth University	23
The Liverpool Institute for Performing Arts	21
Royal Agricultural University	20
University for the Creative Arts	16
Norwich University of the Arts	16
Royal College of Art	15
Rose Bruford College	15
Central School of Speech and Drama	15
University of the Arts, London	15
The Royal Veterinary College	14
Guildhall School of Music and Drama	13
Conservatoire for Dance and Drama	12
Royal Conservatoire of Scotland	12
Ravensbourne	11
Trinity Laban Conservatoire of Music and Drama	11
Writtle College	11
Glasgow School of Art	10
Harper Adams University	10
The University of Chichester	9
Bath Spa University	9
Bournemouth University	9
SRUC	9
The University of Winchester	9
University of St Mark and St John	8

Source: GuildHE analysis of HESA data (submitted to BIS)

Student success and progression

90. Research by the National Audit Office concludes that there are many reasons for students not continuing their studies but that the most common reasons are: personal reasons, lack of integration, dissatisfaction with course/institution, lack of preparedness, wrong choice of course, financial reasons and the wish to take up a more attractive opportunity.¹⁷
91. The Higher Education Funding Council for England (HEFCE) report that entrants to full-time first degrees in 2010-11 who are disabled are less likely to remain in higher education (8.2% non-continuation) at the end of year one when compared to entrants who are not disabled (7.4 % non-continuation). This analysis shows that the proportion of disabled students no longer in higher education is lower than expected given the characteristics of age, subject and entry qualifications of disabled entrants¹⁸. This finding supports earlier research and multivariate analysis by the National Audit Office in 2007 which reported that “both full and part-time students who declare a disability are slightly more likely to continue than those without a (declared) disability when all other factors are held constant”¹⁹.
92. There are small differences in degree outcomes between those who receive DSAs, those who declare a disability but do not receive DSAs, and those not known to be disabled. The proportion of non-disabled first degree qualifiers achieving a first/2.1 is 63.8% whilst for those with a disability it is 61.2%. Disabled students who received DSAs were more likely to obtain a first class or upper second class honours degree (62.2%) than those who did not receive DSAs (60.7%). Chart 4 below shows DSAs recipients’ outcomes on obtaining a degree and on progression to graduate employment or study are 2-3 percentage points above the “sector adjusted average”, i.e. the outcome expected after accounting for other characteristics. Outcomes for the wider group that declare a disability are 2-3 percentage points below this average, whereas outcomes for non-disabled population mirror the “sector adjusted average”.²⁰

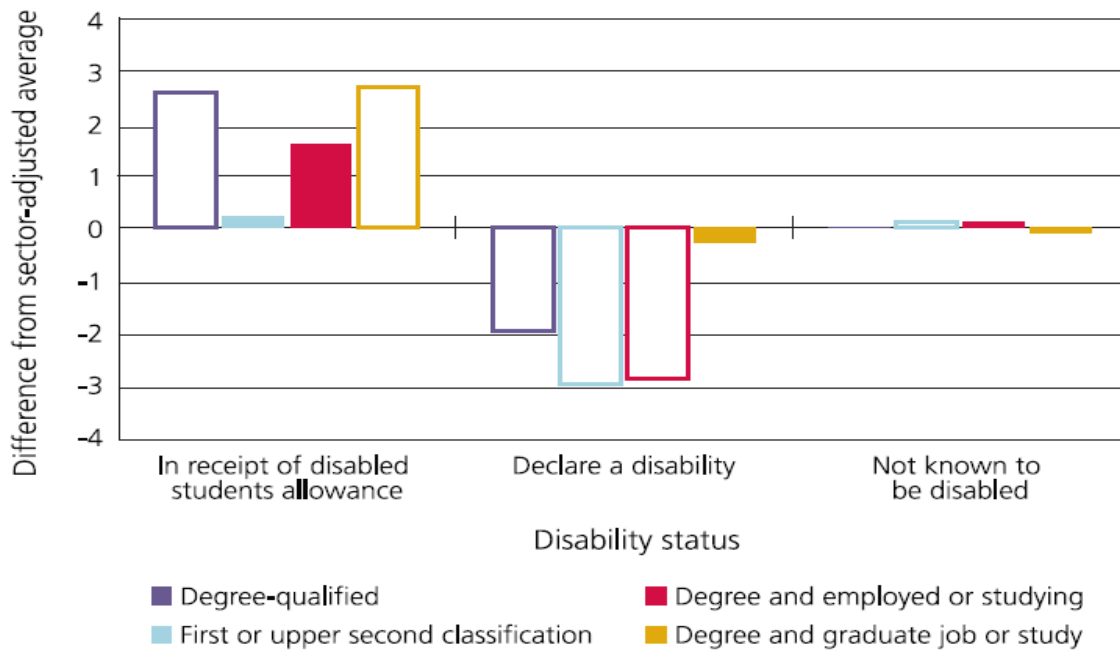
¹⁷ National Audit Office, Staying the course: The retention of students in higher education: REPORT BY THE COMPTROLLER AND AUDITOR GENERAL | HC 616 Session 2006-2007 | 26 July 2007

¹⁸ Non-continuation rates at English HEIs: Trends for entrants 2005-06 to 2010-11, HEFCE, 2013. Disability definition based on self-reported characteristics and students claiming DSAs.

¹⁹ Controls for type of institution attended, prior qualifications, course studied, gender, age, socio-economic status, HE neighbourhood participation and ethnicity. See footnote 16.

²⁰ HEFCE/OFFA’s National strategy for access and student success in higher education, BIS, April 2014, pp.49-50

Chart 4: Percentage point difference of the outcome from the sector-adjusted average for the four outcomes, by disability status



Source: HEFCE/OFFA’s National strategy for access and student success in higher education

Note: Where a bar is filled in the graph, this indicates that the difference is not statistically significant.

Funding and provision for students with disabilities

Summary

- Published figures show DSAs spending increased by around 44% between 2009/10 and 2012/13, from £101.3m to £145.8m. Provisional figures for 2013/14 are slightly lower than the peak seen in 2012/13.,
- The majority of DSAs funding is directed to non-medical help, followed by spending on equipment.
- Additional funding of £15m is also delivered directly to institutions by HEFCE from its disability allocation to help recruit and support disabled students.
- In 2012/13 institutions allocated around £39m of their access agreement expenditure to specifically supporting disabled students.
- Significant improvements in the provision of support for disabled students have been made since 1999. However there is some evidence to suggest that provision across the sector may still be inconsistent.

Government funding

93. In 2012/13 a total of £145.8m was awarded to students through DSAs. Table 3 shows that total DSAs expenditure has increased by around 44% over three years. Provisional data for 2013/14 suggests that the overall number of DSA applicants is likely to rise from 2012/13 levels.

Table 3: DSAs expenditure, number of applicants and average award amount by level and mode of study

	Description	2009/10	2010/11	2011/12	2012/13	2013/14 (provisional)	%age change 2009/10-2012/13
Under graduate full-time	Number of applicants awarded ('000s)	41.7	47.4	53.3	56.6	58.5	35.7%
	Amount paid (£m)	87.8	109.2	125.1	127.6	126.1	45.3%
	Average award (£)	2,110	2,300	2,350	2,250	2,160	6.6%
Under-graduate part-time	Number of applicants awarded ('000s)	2.2	2.6	3	3	2.5	36.4%
	Amount paid (£m)	5.3	6.9	7.9	7.3	6	37.7%
	Average award (£)	2,410	2,650	2,630	2,430	2,400	0.8%
Post-graduate	Number of applicants awarded ('000s)	3.5	3.9	4.7	4.9	4.9	40.0%
	Amount paid (£m)	8.2	9.6	11.8	10.9	9.8	32.9%
	Average award (£)	2,340	2,460	2,510	2,220	2,000	-5.1%
Total	Amount paid (£m)	101.3	125.7	144.8	145.8	141.9	43.9%

Source: SLC, Statistical First Release on Student Support for Higher Education in England (27/11/2014).

Note: 2013/14 figures are provisional, and liable to upward revision

94. Table 4 shows SLC's monitoring information for DSAs spend in 2011/12 (the latest available finalised data) by type of DSAs expenditure. For undergraduates both full-time and part-time this shows expenditure separately for the four elements of support available to undergraduates: general, travel, equipment and non-medical help (NMH). The table shows that the largest area of expenditure for full-time undergraduate students was for Non-Medical Help at £74m²¹, followed by equipment at £43.3m.

Table 4: Amount of approved Disabled Students' Allowances by DSAs type and number of applicants in Academic Year 2011/12 (England)

	Description	Amount awarded (£m)	Number of applicants awarded* (000s)	Average award (£)
Undergraduate	Full-time DSA – General	4.6	22.3	210
	Full-time DSA – Travel	3.0	1.7	1,770
	Full-time DSA – Equipment	43.4	29.1	1,490
	Full-time DSA – NMH	74.0	47.0	1,580
	Full-time total	125.1	53.3	2,350
	Part-time DSA – General	0.3	1.5	200
	Part-time DSA – Travel	0.4	0.3	1,390
	Part-time DSA – Equipment	2.4	1.6	1,480
	Part-time DSA – NMH	4.8	2.6	1,800
	Part-time total	7.9	3.0	2,590
Postgraduate	Postgraduate DSA	11.8	4.7	2,520
	2011/12 totals	144.8	61.0	2,370

Source: SLC, Statistical First Release on Student Support for Higher Education in England (28/11/2013) and SLC, DSA approved expenditure report – England (as of 31/10/2013)

Note: Students will draw down from a number of allowances and therefore these figures do not equate to the sum total of students in receipt of DSAs.

95. Non-Medical Help (NMH) spending is now divided into bands: ranging from band 1, the lowest-paid helpers (such as library support assistants), to band 4, the highest paid (such as sign language interpreters). The SLC does not provide official statistics on spending by band, but a sample of DSAs recipients provided to BIS indicates that band 4 accounts for the majority of Non-Medical Help spending (see Table 5).

²¹ The cost of the DSA study needs assessment was drawn from the non-medical help allowance in 2011/12. The cost of the study needs assessment is now drawn from the general allowance.

Table 5: Breakdown of Non-medical Helper expenditure by type of support, sample of DSAs recipients 2012/13

Band	% of Non-medical Helper expenditure
Band 1 (e.g. proof reader, scribe)	5%
Band 2 (e.g. exam support, study assistant)	3%
Band 3 (e.g. transcription)	6%
Band 4 (e.g. study skills, Assistive Technology training)	64%
Band not known	22%

Source: sample of 1163 DSA recipients who were new entrants to Higher Education in 2012/13, provided by the Student Loans Company

Note: includes 700 students with Specific Learning Difficulties and 463 with other disabilities

96. In addition to DSAs funding provided by the government direct to the student, funding is delivered directly to publicly-funded institutions through the HEFCE mainstream disability allocation. In 2014-15 this funding was £15m²². This funding is provided to institutions to assist with the recruitment and support of disabled students. The funding may be used to fund a variety of support, which may include equipment, extra staff, learning aids and facilities for disabled students as well as individual funding for students with disabilities.

Institutional expenditure and provision for disabled students

97. A HEFCE review of disability provision in 2009 concluded that there had been significant developments in institutional support to meet the entitlements of disabled students since their original guidance to the sector was issued in 1999²³. The research found that the vast majority of institutions were complying fully with the Disability Equality Duty (DED) legislation, with disability issues regularly considered across a range of institutional functions and processes and evidence of widespread commitment and innovation among key staff in institutions. However, the review also found there were inconsistencies among institutions regarding the quality and level of support provided to disabled students, and there were still some instances of unmet entitlement. The report stated that although support services for disability are widespread there were differences in the prioritisation of different impairment categories and the subsequent level of resource committed to them. As part of the review, survey results suggested that a very small number of institutions may have failed to meet all of the component parts of the Disability Equality Duty. Areas that some institutions found challenging include:

- Involving disabled students in the production of their Disability Equality Scheme (DES)
- Either producing an annual report on actions or targets in their DES or making the annual report publicly available and easily accessible
- The extent to which disability data was monitored and acted upon in some institutions appeared to be limited.

²² National strategy for access and student success in higher education, OFFA and HEFCE March 2014, published by BIS

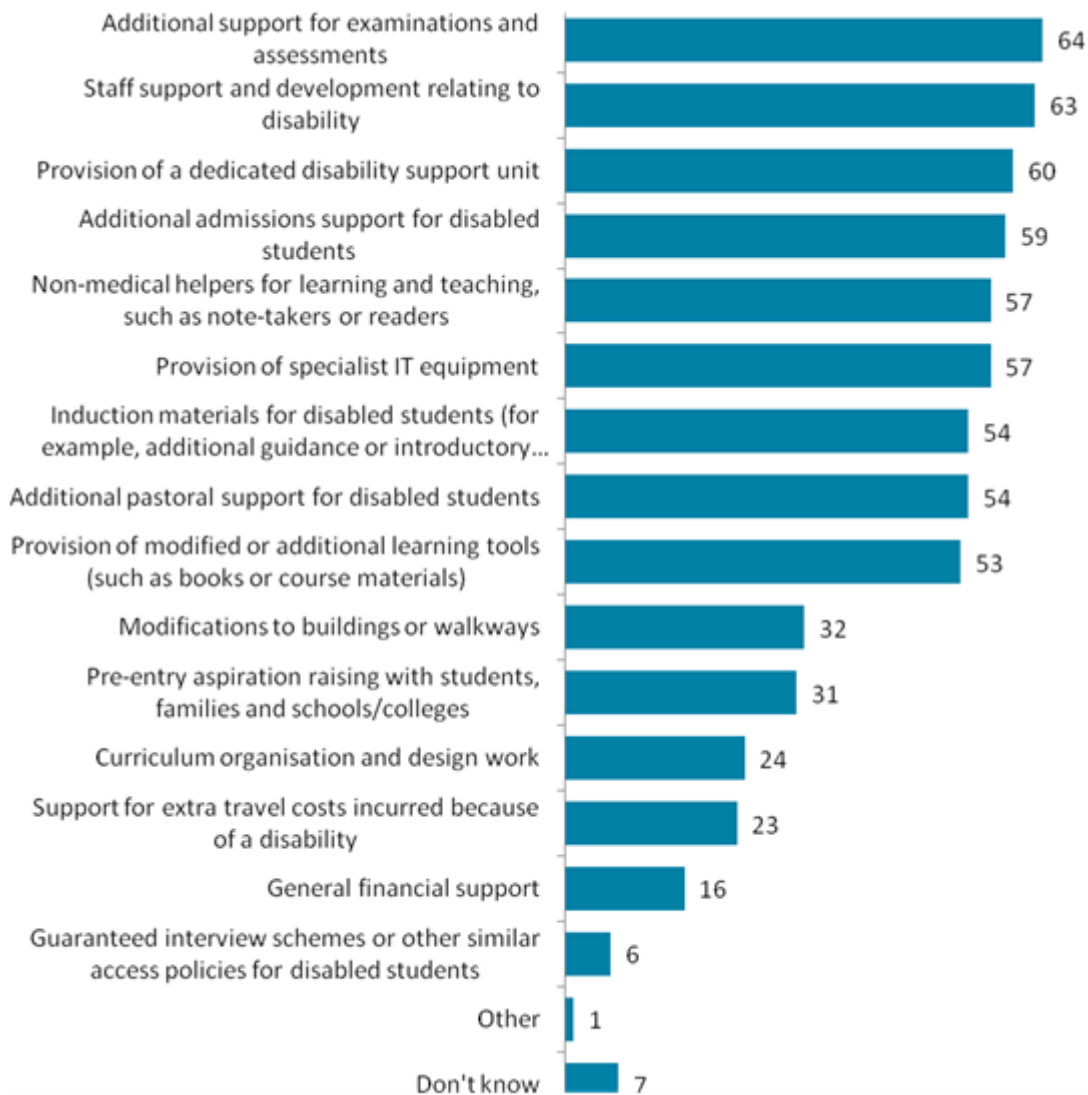
²³ Outcomes of HEFCE review of its policy as it relates to disabled students, HEFCE 2009/49, December 2009.

98. Overall the review concluded there had been ‘significant progress in support for disabled students but further work is needed to embed support and move towards disability equality’.
99. The recent joint report by HEFCE and OFFA on the outcomes of expenditure on widening participation activity showed that at a sector level English publicly-funded institutions reported that their total support for disabled students (including provision of advice and support to disabled students and potential students, and inclusive learning and teaching environments) increased to £51.7 million in 2012-13 (up from £49.9 million in 2011-12)²⁴. This comprised £4.2 million in outreach and £47.5 million in support for current disabled students and included the £13 million delivered by HEFCE’s disability allocation to institutions. In 2013-14 access agreements, one in five institutions mentioned disability among their National Scholarship Programme bursary eligibility criteria, and a further 7% of 2013-14 access agreements included non-National Scholarship Programme bursaries directed at students with disabilities²⁵.
100. The joint report by HEFCE and OFFA highlighted that in terms of outcomes around equality and diversity key activities reported by institutions in 2012/13 included inclusive curriculum development and additional support for learners with disabilities. However only twenty institutions highlighted in their reports the attainment and retention of learners with specific disabilities, although OFFA and HEFCE report that there was evidence in the returns from institutions that institutions are making the whole higher education experience more inclusive for all students.
101. A report by CFE/Edge Hill University on the uses and impact of HEFCE funding found that institutions provide support for a range of activities from the HEFCE mainstream disability allocation (see Chart 5). While some institutions have developed a targeted approach focusing on the specific needs of the individual student, others are adopting an inclusive model that seeks to ensure all aspects of the institutional offer are accessible to disabled students. Some forms of provision are more commonly provided across the sector than others. The study showed that 64 institutions out of the 89 included in the research provided additional support for examinations and assessments and 60 provided a dedicated disability unit whereas fewer (53) provided modified or additional learning tools such as books or course materials.

²⁴ Outcomes of access agreement, widening participation strategic statement and National Scholarship Programme monitoring for 2012-13, HEFCE July 2014/15 and OFFA July 2014/05.

²⁵ National strategy for access and student success in higher education, OFFA and HEFCE March 2014, published by BIS.

Chart 5: Number of institutions delivering listed activities using the HEFCE mainstream disability allocation (base = 89)



102. HEFCE guidance recommends a minimum of one disability practitioner for every 200 DSAs recipients. A survey of institutions conducted in May 2014 by the National Association of Disability Practitioners reached 63 institutions in the UK of which 53 were in England (Table 6). The survey found that English institutions currently employ one disability practitioner for around every 300 students in receipt of DSAs, a higher ratio than in Wales (one for every 400), but lower than in Scotland (one for every 225). Given the sample sizes and the likelihood that the achieved sample is not fully representative of the sector, these results need to be treated with some caution, particularly comparisons between countries. In addition the researchers reported that there was some uncertainty amongst institutions as to the definition of a disability practitioner, with some respondents excluding mental health workers or student helpdesk advisors. However the research suggests that the sector is not exceeding HEFCE's guidance on minimum provision of disability practitioners.

103. A survey of disability practitioners conducted by researchers at the University of Southampton found that institutions provided a range of disability support roles (Table 7)²⁶. Specialist study skills tutors were particularly common, and 62.5% of respondents said that their tutor was at least three-quarters funded by DSAs. Again these results should be treated with caution. They do at least suggest that provision of disability support is more concentrated on the employment of specialist study skills tutors and less on the provision of support to help students in accessing alternative formats of reading materials and using assistive technology. However there may have been some confusion as to definitions of job roles and advisor roles in institutions may cover support needs for all student groups, not just students with disabilities.

Table 6: Number of Disability Practitioners at UK institutions

Country	Total no of FTE Disability Practitioners	Total number of DSAs students at institution respondents	No of Disability Practitioners per 200 students in receipt of DSAs
England	207.7	60,375	0.7
Scotland	15.7	3,530	0.9
Wales	14.7	6,170	0.5
Northern Ireland	5	1,230	-
Total	243.1	71,395	0.7

Source: Based on data submitted to BIS from the report, Snapshot of disability provision in UK HEIs – May 2014

Table 7: Provision of disability support roles at UK institutions

Country	England	Scotland	Wales
% employing specialist study skills tutors	84%	75%	100%
% of institutions with a role responsible for inclusive learning practice	31%	100%	100%
% of institutions that have policy statements encouraging the development of inclusive learning practice	72%	100%	100%
% of institutions that employ at Assistive technology trainer	19%	100%	100%
Average % of A.T role funded by DSAs	45%	42%	83%
% of institutions that have a role responsible for advising or supporting students on the use of assistive technology within the institution	30%	100%	60%
% of institutions that have a role responsible for supporting disabled students in accessing alternative formats of reading materials	34%	50%	60%

Source: Based on data submitted to BIS from the report, Snapshot of disability provision in UK HEIs – May 2014

²⁶ Abi James and E.A. Draffan, Snapshot of disability provision in UK HEIs – May 2014

104. The National Association of Disability Practitioners reported that Assistive Technology was provided to students in different ways. Most commonly, specialist software was made available to students over the network. Hardware such as scanners and magnifiers was provided in the library or, less frequently, in dedicated assistive technology rooms (Table 8).

Table 8: Availability of Assistive Technology facilities in UK institutions

Facility	% of institutions where this facility is available to...			
	...all students	...some students	...no students	Don't know
Specialist software on network	76.2%	9.5%	6.3%	6.3%
Assistive Technology in a dedicated room	17.5%	44.4%	28.6%	9.5%
Assistive Technology in the university library	57.1%	33.3%	4.8%	4.8%

Source: Based on data submitted to BIS from the report, Snapshot of disability provision in UK HEIs – May 2014

The characteristics of DSAs recipients

Summary

- The gender and socio-economic profile of English domiciled disabled HE entrants to UK institutions that receive DSAs is very similar to higher education entrants without a known disability.
- Around two thirds of higher education entrants receiving DSAs are from the top three socio-economic groups (managerial, professional and associate technical groups). Only 12% are from low participation neighbourhoods.
- Young people are over-represented in the DSAs recipient group, whereas ethnic minority students are under-represented.
- DSAs recipients are slightly more likely to be awarded the full maintenance grant: 43% of all full time undergraduate applicants for student support in 2012/13 received the full grant compared to 47% of comparable DSAs recipients.
- The gender and age profile of recipients of the equipment and non-medical help elements of DSAs is broadly similar to that for the undergraduate DSAs group as a whole. The proportions awarded the full maintenance grant are also broadly similar.
- Female and mature undergraduate students are particularly likely to apply for General and Travel related forms of DSAs support. A higher proportion is awarded the full maintenance grant.
- The group of students claiming the smallest equipment grant (under £500) has an older age profile than the overall DSA equipment segment. In addition the group claiming the most (over £3000) are around twice as likely to be over 25.
- The larger the DSAs equipment grant claimed, the more likely students are to be eligible for a full Maintenance Grant.

Profile of the DSAs recipient population

105. Data from the HESA student record is examined to ascertain whether groups with protected characteristics other than disability are over, under or proportionately represented in the sub group of English domiciled student at UK institutions that are in receipt of DSAs.
106. Table 9 shows that the gender profile of English domiciled entrants to UK institutions that declare a disability and the subgroup of these that receive DSAs is the same as entrants without a known disability: the majority (59%) are female.
107. The age profile of entrants that declare a disability is similar to that for entrants without a known disability. However the subgroup of entrants that receive DSAs is younger: most of them (51%) are under 21 compared to 43% of entrants with no known disability.
108. The ethnic profile of disabled entrants is different to that of those with no known disability: only 17% of disabled entrants are from a minority ethnic background compared to 24% of non-disabled entrants. This is due to lower representation of Asian and African-background entrants amongst disabled students. The profile of the DSAs recipient group does not differ significantly from that of the wider group of entrants declaring a disability.
109. In terms of measures of disadvantage based on socio-economic class and on neighbourhood participation rates the profile of the three groups is similar: around two thirds of entrants are from the

top three socio-economic groups (managerial, professional and associate technical groups) and only around one in eight students (12-13%) are from low participation neighbourhoods.

110. A slightly higher proportion of DSAs recipients are awarded the full maintenance grant. An analysis of SLC data on undergraduate student finance applicants finds that at the end of Academic Year 2012/13, 47% of eligible DSAs recipients applicants were awarded a full maintenance grant compared to 43% of the wider population of all eligible student finance applicants²⁷.

Table 9: Profile of university entrants by disability status, Academic Year 2012/13

Disability status	Gender		Age			Disadvantage	
	Male (%)	Female (%)	Under 21 (%)	21 to 24 (%)	25+ (%)	NS-SEC classes 4-7 (%)	Low participation neighbourhoods (POLAR3 Q1) (%)
No known disability	41	59	43	17	40	35	12
Declared disability	41	59	43	19	39	33	13
DSA recipient	41	59	51	19	30	33	12

Source: HESA, English-domiciled entrants at UK institutions, all modes at all levels of study

Disability status	BME	White	Black				Asian				Other
	Any ethnic minority (%)	White (%)	Caribbean (%)	African (%)	Other (%)	Indian (%)	Pakistani (%)	Bangladeshi (%)	Chinese (%)	Other (%)	Mixed/Other (%)
No known disability	24	76	2	6	0.4	4	3	1	1	2	5
Declared disability	17	83	3	4	0.5	2	2	1	0.4	1	5
DSA recipient	18	82	3	4	1	2	2	1	0.4	1	5

111. Table 10 shows the characteristics of DSAs recipients that are considered to be disadvantaged according to socio-economic background.²⁸ The data shows that the pattern of male and female participation across advantaged and disadvantaged students is broadly similar.

²⁷ These are prospective students who had been approved for Maintenance Grant and would be paid the grant if they became attending students. Eligible student finance applicant population includes students on postgraduate Initial Teacher Training courses, who are eligible for maintenance funding.

²⁸ Disadvantaged according to NS-SEC classes 4-7 (small employers and own account workers, lower supervisory and technical occupations, semi-routine occupations and routine occupations)

112. In terms of age, DSAs recipients from advantaged backgrounds are significantly more likely to be younger than recipients from more disadvantaged backgrounds: 76% of DSAs recipients from the highest socio-economic groups (NS-SEC 1-3) are aged 21 or under, compared with 59% of recipients from the more disadvantaged socio-economic groups (NS-SEC 4-7) and 35% of recipients with the socioeconomic status “never worked and long-term unemployed”. DSAs recipients from disadvantaged backgrounds are significantly more likely to be aged 25 and over.

113. There also appears to be differences in participation of minority ethnic groups across social background, with minority ethnic DSAs recipients overrepresented as a proportion of recipients from more disadvantaged backgrounds. Of those from the highest socio-economic groups, 12% are from minority ethnic groups. This rises to 17% of recipients from the more disadvantaged socio-economic groups and 23% of DSAs recipients with the socio-economic status “never worked and long-term unemployed”. DSAs recipients with ethnic background listed as ‘Other’ (which includes mixed ethnicity) are significantly overrepresented amongst recipients in the socio-economic group “never worked and long-term unemployed”.

Table 10: Profile of DSA recipients by socio-economic status, entrants in Academic Year 2012/13

SES status	Gender		Age		
	Male (%)	Female (%)	Under 21 (%)	21 to 24 (%)	25+ (%)
Advantaged (NS-SEC Classes 1-3)	43%	57%	76%	10%	14%
Disadvantaged (NS-SEC Classes 4-7)	40%	60%	59%	18%	23%
Disadvantaged - Never worked and long-term unemployed	38%	62%	35%	25%	41%
Total	42%	58%	70%	13%	17%

SES status	BME	White	Black			Asian					Other
	Any ethnic minority (%)	White (%)	Caribbean (%)	African (%)	Other (%)	Indian (%)	Pakistani (%)	Bangladeshi (%)	Chinese (%)	Other (%)	Mixed/ Other (%)
Advantaged (NS-SEC Classes 1-3)	12%	76%	2%	3%	0%	2%	1%	0%	0%	0%	4%
Disadvantaged (NS-SEC Classes 4-7)	17%	66%	2%	4%	1%	2%	2%	1%	1%	1%	4%
Disadvantaged - Never worked and long-term unemployed	23%	55%	2%	4%	0%	2%	4%	1%	0%	1%	8%
Total	14%	72%	2%	3%	0%	2%	1%	0%	0%	1%	4%

Source: HESA, English-domiciled entrants at UK institutions, all modes at all levels of study. SES information is based on 60% of all DSAs recipients

114. Almost half of students with disabilities (47%) have a Specific Learning Difficulty (SpLD). Students with a Specific Learning Difficulty who receive DSAs have a similar profile to other DSAs recipients; except that they tend to be younger (in Table 11 54% are under 21, compared with 51% of all DSAs recipients in Table 9). Students with a Specific Learning Difficulty who do not receive DSAs are more likely to be male and more likely to be mature than those who receive it.

Table 11: Profile of university entrants with Specific Learning Difficulties, Academic Year 2012/13

Disability status	Gender		Age			Disadvantage	
	Male (%)	Female (%)	Under 21 (%)	21 to 24 (%)	25+ (%)	NS-SEC classes 4-7 (%)	Low participation neighbourhoods (POLAR3 Q1) (%)
Not receiving DSA	46	54	44	21	35	31	11
DSA recipient	41	59	54	21	25	33	11

Source: HESA, English-domiciled entrants with Specific Learning Difficulties at UK institutions, all modes at all levels of study

Disability status	BME	White	Black			Asian					Other
	Any ethnic minority (%)	White (%)	Caribbean (%)	African (%)	Other (%)	Indian (%)	Pakistani (%)	Bangladeshi (%)	Chinese (%)	Other (%)	Mixed/Other (%)
Not receiving DSA	16	84	3	3	0.4	2	1	0.5	0.3	1	5
DSA recipient	17	83	3	4	1	2	1	1	0.4	1	5

115. Table 12 sets out data provided by the SLC on the characteristics of DSAs applicants by type of DSA support. The only robust data available is on the protected characteristics of age and gender²⁹. Despite this limitation the data is useful in potentially identifying whether a group with a shared protected characteristic would be particularly affected by a policy change aimed at a specific type of DSAs support. The proportion in receipt of a full maintenance grant is also provided as a measure of disadvantage. Note that this data covers full-time and part-time undergraduate students only, i.e. excludes postgraduate students.

²⁹ Data on ethnicity collected by the SLC is self-reported and only a small proportion of students provide this data to the SLC

116. The analysis shows that the gender, age band and disadvantage profile of students applying for Non-medical Helper and Equipment support is broadly equal to the overall DSAs population³⁰.

117. However, the evidence suggests that female students are particularly likely to apply for General and Travel related forms of DSAs support. Applicants for these elements of support more likely to be in the older age group compared to other elements of DSAs support. A higher proportion of applicants for the General and Travel element of DSAs support students are awarded the full maintenance grant.

Table 12: Profile of DSAs undergraduate applicants by type of DSAs support 2012/13

Type of DSA	Gender		Age			Disadvantage
	Male (%)	Female (%)	Under 21 (%)	21 to 24 (%)	25+ (%)	Full Maintenance Grant / Student Support Grant (%) [1]
Non-medical Helper	42	58	58	20	22	44
Equipment	42	58	59	19	22	45
General	36	64	50	20	30	47
Travel	32	68	37	19	45	62
Total DSAs undergraduate recipients	42	58	57	20	23	44%

Source: SLC data for elements of DSAs Expenditure and HESA data for the base group of all undergraduate DSA recipients (English-domiciled enrolments at UK institutions, at all modes of study)

Note: [1] Percentage of full-time undergraduate applicants (part-time are not eligible for maintenance grant)

Further analysis of DSAs equipment support

118. Further analysis was undertaken to understand the levels of equipment support claimed under DSAs and whether different groups received different levels of support. A data extract from the SLC management information shows that around one third of students in receipt of equipment support claimed £1,000-£1,250 (the modal group). The vast majority (over 80%) claimed under £1,750.

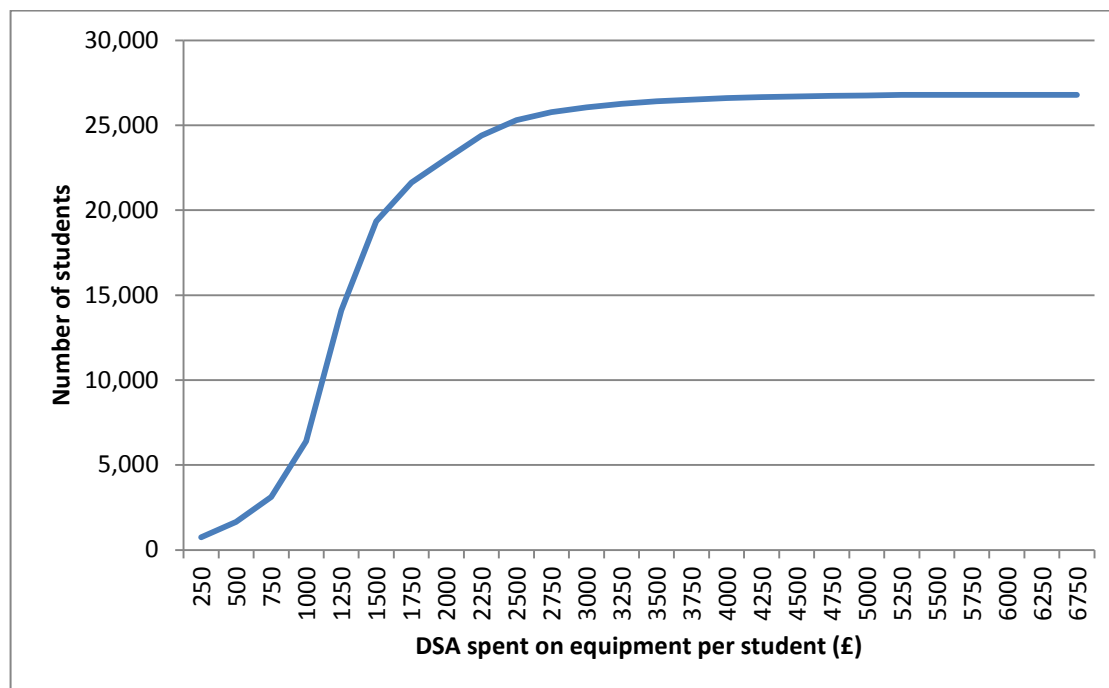
119. The further analysis of students who claim DSAs for equipment spending suggests that the gender balance does not change substantially by the size of the equipment grant (Table 12). Those spending the most on equipment (over £3,000) are roughly twice as likely as the others to be over 25. Interestingly, the group with the smallest equipment spend (under £500) is also older than the overall DSAs equipment group (Table 12 and 13).

120. The higher a student's DSAs equipment grant the more likely they are to be eligible for a full Maintenance Grant (i.e. have a household income below £25,000), with the highest spending group

³⁰ This is unsurprising, given that the majority of DSAs applicants apply for Non-medical helpers and equipment support (see Table 3)

being 15 percentage points more likely to be awarded the full Maintenance Grant than the lowest spending group. This may, in part be explained by the higher proportion of this group that are in the over 25 age category. Mature students are more likely to be awarded the full maintenance grant as they are more likely to be judged on individual rather than household incomes.

Chart 6: Cumulative frequency chart of DSAs spending on equipment (2012/13)



Source: SLC data (excludes all DSA recipients who did not claim for equipment)

Table 13: Profile of undergraduate DSAs recipients by size of equipment grant (2012/13)

Equipment grant (£)	Gender		Age			Disadvantage
	Male (%)	Female (%)	Under 21 (%)	21 to 24 (%)	25+ (%)	Full Maintenance Grant / Student Support Grant (%)
Less than 500	40	60	47	29	24	36
500-1000	42	58	57	22	20	41
1000-2000	42	58	61	17	22	43
2000-3000	39	61	60	17	22	44
More than 3000	40	60	46	10	44	51

Note: excludes DSA recipients who did not receive an award for equipment

Access to and use of computers by students in Higher Education

Summary

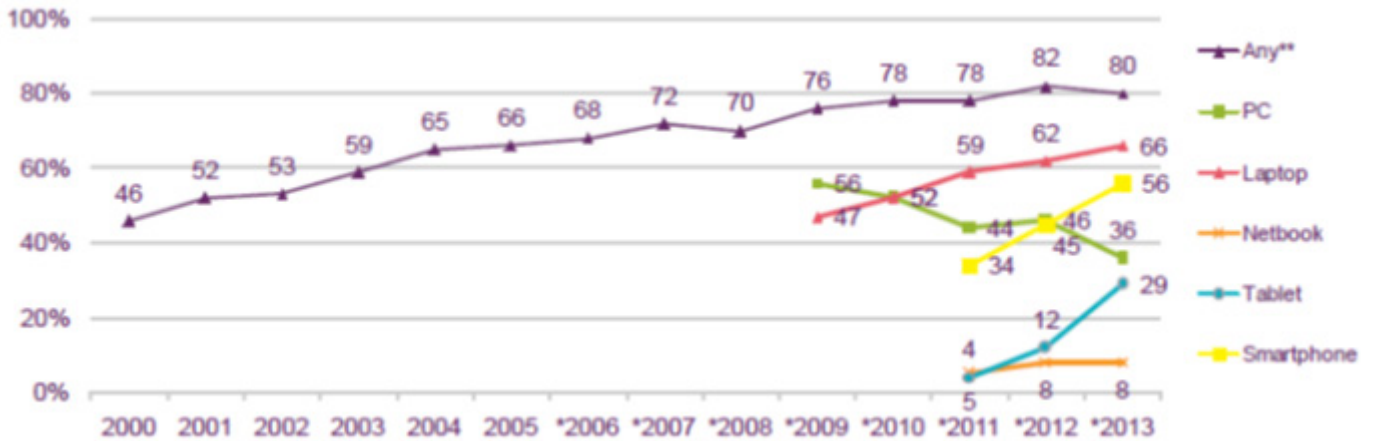
- Laptop ownership has grown significantly in recent years amongst the wider population with two-thirds (66%) of adults having at least one in the household in 2013.
- The highest level of laptop ownership remains among those aged between 16 and 44 (over 7 in 10).
- Laptop ownership is highest among the higher socio-economic groups, although the overall rise in ownership is largely driven by take-up among those in the middle socio-economic groups. The lower socio-economic groups are the least likely to own a laptop or computer.
- Research shows that ownership of computers in the general population is generally higher amongst non-disabled people than disabled people. However, the gap in ownership between young people is much less marked. The research also suggests that there are differences in ownership by socio-economic group, with the gap in ownership being largest between non-disabled people and disabled people in the lower socio-economic groups.
- There is limited evidence available on laptop ownership **amongst higher education students**, but all the available evidence suggests that ownership and usage at university is high, at three quarters of students or higher. However there is an absence of evidence on the technical specification of the laptop that students typically have. Although one survey shows around a third of students are using a device which is between three and five years old.
- A survey that compares ownership across disabled and non-disabled students finds no evidence that disabled students have lower rates of computer ownership.
- The survey showed that a small majority of disabled students and a significantly larger majority of non-disabled students do not use student support related funding to finance the purchase of their laptops:
 - Two fifths of non-disabled respondents paid for their device using money that they had saved up, compared with around one quarter of disabled respondents.
 - One fifth of disabled students received their device as a present compared to around one third of non-disabled students.
- For disabled students who use government funding to purchase laptops and other devices for study purposes DSAs is the primary source, whereas for non-disabled students who use funding the primary source is a student loan.

121. Evidence on access to and use of computers by students in HE is explored to try to ascertain the extent to which their use has become a cost that the generality of the student population meets. Disabled Students' Allowances were introduced to provide financial help for equipment, non-medical helpers, travel and incidentals that students with a disability often need. However the allowance was not intended to cover disability-related expenditure that a person would incur even if they were not attending a higher education course, or any course-related costs not connected with their disability. In this context it is important to examine how common ownership ICT is, in its many forms, both across the student population and more generally across the wider population.

General trends in access to technology in the wider population

122. The technological environment has changed over the last decade. There has been a steady increase in laptop ownership in recent years and this has followed a steady increase in ownership of PCs or laptops between 2000 and 2008 (Chart 7). Laptops are now the most popular connected device in the household, two-thirds (66%) of adults having at least one in the household in 2013³¹.

Chart 7: Ownership of connected devices in the home



Source: Ofcom communications tracking survey

Base: All adults 16+ (Q4 2000, 2133) (Q4 2001, 2159) (Q4 2002, 2138), (Q4 2003, 2150) (Q4 2004, 2131) (Q4 2005, 2214) (Q2 2006, 2439) (Q2 2007, 2265) (Q2 2008, 2109) (Q2 2009, 2085) (Q2 2010, 2106) (Q2 2011, 2862) (Q2 2012, 2893) (Q2 2013, 2879)

Note: Data for 2006-2013 based on Q2 data, all other data based on Q4. **Data for ‘any’ for 2000- 2010 refers to PC or laptop computers. Data for ‘any’ for 2011-2013 also includes netbook or tablet computers but not smartphones.

123. According to Ofcom the increase in ownership of laptops since 2012 is largely driven by take-up among those aged 45 and over, although the highest levels of laptop ownership remains among those aged between 16 and 44 (over 7 in 10)³². While the highest level of laptop ownership continues to be among the higher (AB) socio-economic groups, the overall rise in ownership is largely driven by take-up among those in the middle (C1 and C2) socio-economic groups (Chart 8). The lower socio-economic groups (DE) are the least likely own a laptop or computer.

124. Earlier research by Ofcom in 2012 focusing on disabled consumers’ ownership of communication services shows that while ownership of a PC for example is commonplace amongst those under the age of 65 it is generally higher amongst non-disabled people (83%) than disabled people (74%)³³. However, the gap in ownership between young people is much less marked with for example 82% of

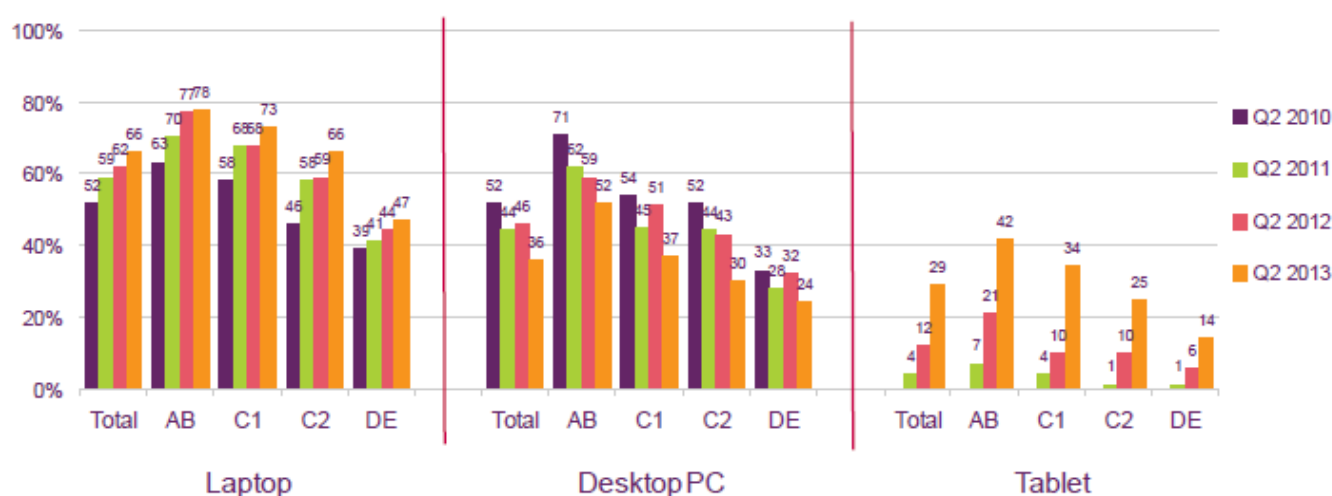
³¹ Ofcom communications tracking survey <http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-13/3-takeup.pdf>

³² ibid

³³ Disabled consumers’ ownership of communications services: A Consumer Experience report, Ofcom, 2012. This survey achieved sample size of 4,095 respondents. http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/disabled/Disabled_consumers_report.pdf

non-disabled people aged 15-34 living in a household with a PC compared to 78% of disabled young people. The research also suggests that there are differences in ownership by socio-economic group, with gap in ownership being largest between non-disabled people and disabled people in the lower socio-economic groups, a 20 percentage point gap for the lower groups compared to a 14 percentage point gap for the higher socio-economic groups. The report does not look at the combined effects of age and socio-economic group for computer ownership, but looking at analysis of personal internet access by disability, age and socio-economic group shows the gap in personal internet access being less pronounced for disabled and non-disabled people aged 15-24, whereas for those aged between 35-54, there is a 4 percentage point gap between disabled and non-disabled from higher socio-economic groups and a 17 percentage point gap between those from lower socio-economic groups.

Chart 8: Socio-economic group profile of laptop, PC and tablet users



Source: Ofcom communications tracking survey

Base: All adults 16+ (Q2 2010, 2106) (Q2 2011, 2862) (Q2 2012, 2893) (Q2 2013, 2879)

Laptop ownership amongst HE students

125. The evidence available on the extent to which higher education students own their own laptops and/or have appropriate access to IT services at home or at institutions that meets their needs is limited, often confined to quick snapshot surveys. However the available evidence suggests that alongside a significant increase in computer, laptop and/or tablet access and ownership in the general population, the majority of students now own their own laptops. There is an absence of evidence on the technical specification of the laptop that the general population of students generally have.

126. A key source of evidence on laptop ownership amongst students both disabled and non-disabled is two surveys undertaken by the NUS³⁴. The first study sampled 1704 students across the UK in 2013. This survey found that 96% of all students now owned a laptop. A more recent NUS study was undertaken in May 2014 and gathered 1,668 respondents from 140 UK universities³⁵. This more recent survey suggests that 78% of students own a laptop³⁶. Taken together the two surveys do

³⁴ The survey was undertaken by NUS on behalf of Endsleigh as part of their 2013 Student Survey. Results published at <http://hub.endsleigh.co.uk/2013/august/students-take-over-£2,000-worth-of-gadgets-to-uni/>. Results need to be treated with some caution as survey results are unlikely to have been randomly sampled and weighted to the student population.

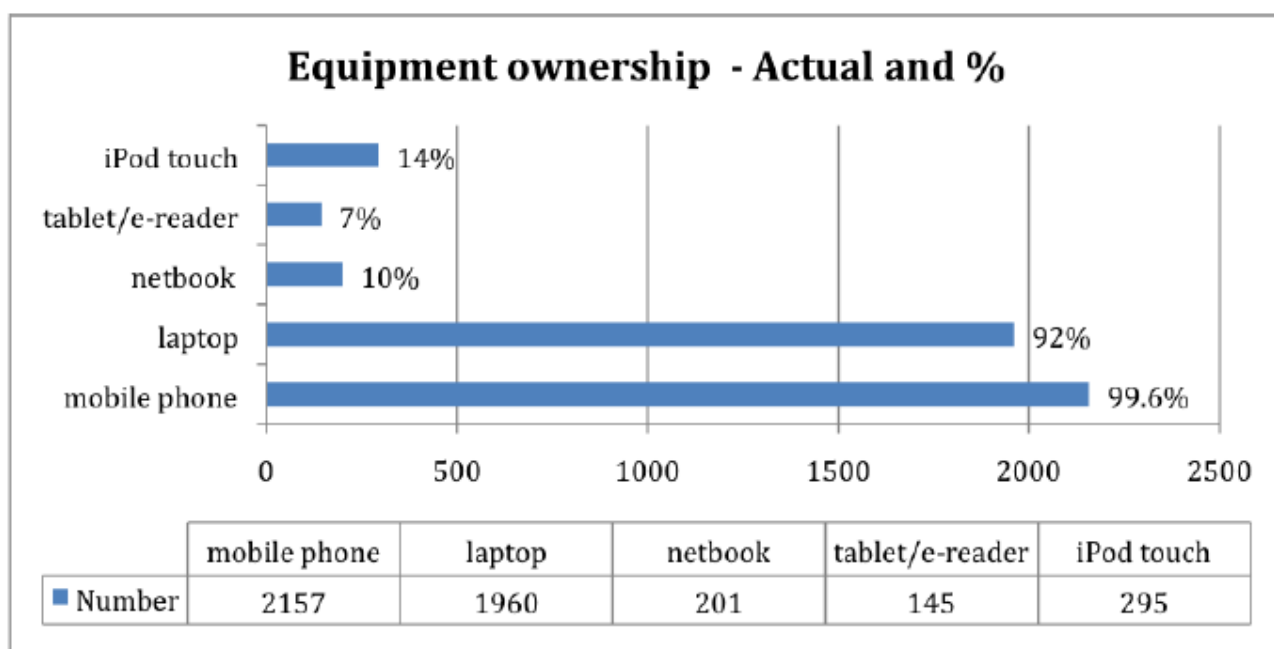
³⁵ <http://www.nusconnect.org.uk/asset/News/6040/Degreesofdiscrimination-researchbrief.pdf>

³⁶ The survey was advertised to students on the NUS extra database but was not randomly sampled, and not weighted to the student population, therefore the statistics should be interpreted with some caution.

suggest that nowadays the majority of students do own laptops and consider them to be an important element of their HE participation. The 2014 survey concluded that regardless of their ownership status and whether they are disabled or not, all respondents reported having to use a device for their studies: 93% said laptops and computers are extremely important to their studies. Students often cited the impossibility of completing their course without computer and access to the internet.

127. A survey by the University of Sheffield in 2011 which received 2,180 responses found that 92% of all their students (93% of undergraduates) owned their own laptop (Chart 9)³⁷. Social science students and Arts students – the subject area more likely to be studied by students with disabilities – had the highest laptop ownership at 94% and 95% respectively, although it is unclear whether this difference is statistically significant. Females were slightly more likely to own a laptop (94% compared to 90% for men). 93% of students aged 18-24 owned a laptop compared to 90% aged 25-34 and 84% of those aged 35 and above. Postgraduates were just as likely to own a laptop as undergraduates (92% compared to 93%).

Chart 9: Mobile device ownership at the University of Sheffield



Source: University of Sheffield student mobile device survey 2011

128. A survey of students by the London School of Economics found even higher ownership of computing devices, with 99% of students surveyed owning a laptop³⁸. It indicated that postgraduate students are as likely as undergraduates to own a laptop, if not more (Table 14).

³⁷ University of Sheffield student mobile device survey 2011

https://www.sheffield.ac.uk/polopoly_fs/1.103665!/file/mobilesurvey2011.pdf

³⁸ Sonja Grussendorf, *Device Ownership, 'BYOD' & Social Media For Learning* (LSE, 2013)

http://eprints.lse.ac.uk/51652/1/IMT_survey_2013.pdf

Table 14: Mobile device ownership at the London School of Economics

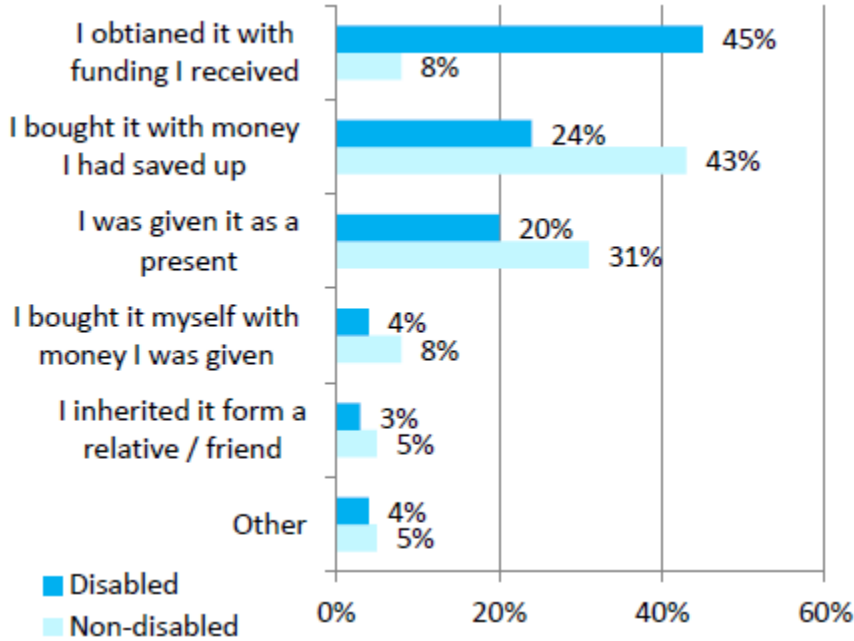
	UG	PG	GC	ALL
Laptop	479 (98%)	585 (99%)	43 (98%)	99%
Mobile phone (w internet)	445 (94%)	548 (99%)	42 (98%)	91%
Mobile w/o internet	22 (5%)	55 (10%)	8 (19%)	8%
Tablet	166 (36%)	202 (36%)	10 (25%)	36%
Other	182 (40%)	255 (46%)	10 (25%)	36%

Source: Device Ownership, 'BYOD' & Social Media for Learning (2013)

129. The latest NUS survey compares ownership across disabled and non-disabled students and finds no evidence that disabled students have lower rates of computer ownership, but it finds that they fund their computer purchase differently.
130. Overall the survey shows that a small majority of disabled students (55%) and a large majority of non-disabled students (92%) do not use student support related funding to finance the purchase of their laptops or other devices used for their university work (Chart 10). A further two fifths (43%) of non-disabled respondents paid for their device using money that they had saved up, compared with around one quarter (24%) of disabled respondents. One fifth of disabled students received their device as a present compared to around one third of non-disabled students. Of the 45% of disabled students in the sample that acquired their device through funding they received, the vast majority (83%) used DSAs funding that was available to them (Chart 11). Of the 8% of non-disabled students that used official funding for their purchase, the majority used student loans, followed by maintenance grants.
131. The NUS study serves to confirm that for disabled students who use government funding to purchase laptops and other devices for study purposes DSAs is the primary source, whereas for non-disabled students who use funding the primary source is a student loan offer.
132. The NUS survey also showed that the device students use most often for their university work is quite new on average with six in ten (60%) of students using a device which is less than two years old. Slightly more than a third (34%) used a device which is between 3 and 5 years old.

Chart 10: Mode of acquisition of the device

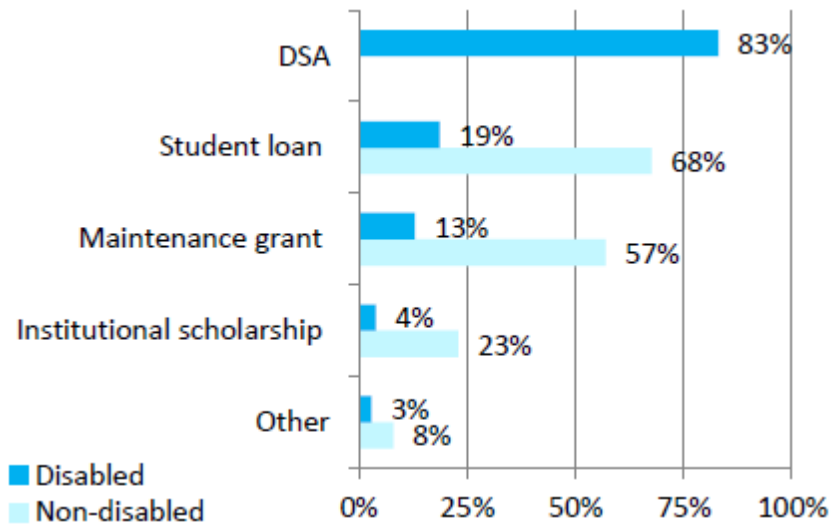
Which of the following best describes how you acquired the device you use for your university / college work?



Source: NUS survey “Degrees of discrimination”, 2014

Chart 11: Type of funding received to acquire the device

Please tell us what funding you received to help you buy / acquire the device you use for your university work?



Source: NUS survey “Degrees of discrimination”, 2014

Disabled students' income and expenditure and impact on the decision to participate in higher education

Summary

- The 2011/12 Student Income and Expenditure Survey (SIES) showed that full-time disabled students (those in receipt of DSAs) appear to have lower average levels of total borrowings.
- While the SIES raw data shows that total expenditure for the academic year was higher amongst disabled students than non-disabled students further analysis showed that this was explained by other factors, mainly family and housing circumstances: disabled students were more likely to be owner-occupiers or renting alone or with family.
- While there was little difference in participation costs between disabled and non-disabled students, SIES data showed that there was a difference in computer expenditure: those in receipt of DSAs had a mean expenditure on computer equipment of around £335 compared to around £163 for non-disabled students.
- Disabled students receiving DSAs support up to and including £1000 were only slightly less likely to work during the academic year compared to their counterparts not in receipt of DSAs (47% compared to 53%), where as those receiving more than £1000 in DSAs support were much less likely to work (32%).
- The impact of the availability of student support on the decision to participate in HE for those students in receipt of DSAs of less than or equal to £1000 was similar to non-DSAs students, for both groups around one third said that student funding and support available to them affected their decisions about study.
- For those in receipt DSAs for higher amounts, i.e. more than £1000, attitudes were quite different. Just over half said that student funding and support available to them affected their decisions about study.
- Research by the NUS shows that disabled students are more likely to be worried about not having enough money to meet basic living expenses such as rent and utility bills than students overall.

Evidence from the Student Income and Expenditure Survey³⁹

³⁹ The statistics in this section from the Student Income and Expenditure survey should be treated with some caution. The survey was representative of English domiciled undergraduate students but the design of the survey (and weighting) was not specifically representative of disabled students. Sample sizes for disabled students are relatively small and are shown as footnotes where appropriate. Figures are for full-time under-graduate students only

Income from student loans, overdrafts and commercial credit

133. The 2011/12 Student Income and Expenditure Survey (SIES) showed that full-time disabled students (those in receipt of disability allowance) appear to have lower average levels of total borrowings⁴⁰. Overall the mean total borrowings for all full time students were £9,720⁴¹. The mean for those in receipt of DSAs was £8,970 compared to non-disabled students of £9,760 (See Table 15).

Table 15: Total borrowing

Whether received/expected to receive money from the Disabled Students Allowance	Mean	N	Std. Deviation
Yes	8970	180	5950
No	9760	3240	7440
Total	9720	3419	7370

Source: internal analysis of the 2012 Student Income and Expenditure Survey

Note: Relates to old funding system but includes student loans; overdrafts and commercial credit

Expenditure

134. The 2011/12 Student Income and Expenditure Survey (SIES) showed that total expenditure for the academic year was higher amongst disabled students than non-disabled students (£14,790 compared with £13,610 for students without disability). However regression analysis showed that the observed differences were explained by the associations with other factors. Family and housing situation were the factors often related to higher spending amongst students. Disabled students were more likely to be owner-occupiers or renting alone or with family, compared with non-disabled counterparts who were more likely to live with their parents or share rented accommodation with friends. Difference in disability status was not significant in the regression model.⁴²

135. In terms of the element of expenditure that is defined as participation costs further analysis of SIES shows little difference overall between those receiving DSAs and those non-disabled students in total participation costs (Table 16). However those in receipt of DSAs had a mean expenditure on computer equipment of around £335 compared to around £163 for non-disabled students (Table 17).⁴³

⁴⁰ Total borrowing is predicted level of borrowing by the end of the academic year (2012)

⁴¹ Note mean is based on all students including those with zero borrowings.

⁴² Note that this was all students who reported a disability not those in receipt of a disability allowance

⁴³ Some caution needed as sample sizes small for disabled sample – indicative differences

Table 16: Total participation costs

Whether received/expected to receive money from the Disabled Students Allowance	Mean	N	Std. Deviation
Yes	3790	87	1270
No	3980	1600	1410
Total	3970	1687	1410

Table 17: How much spent on computer/computer equipment

Whether received/expected to receive money from the Disabled Students' Allowances	Mean	N	Std. Deviation
Yes	335	93	1010
No	163	1738	316
Total	172	1832	384

Working while studying

136. The Student Income and Expenditure Survey reports that 52% of all full time HE students⁴⁴ undertook some paid work during the academic year (note academic year includes Christmas and Easter vacation but not summer vacation). Splitting the sample into those who were in receipt of (or expected to receive) DSAs⁴⁵ compared to all other students shows that 42% undertook some form of paid work during the academic year whereas the proportion of all other students undertaking some form of paid work was 53%.

137. For those actually in receipt of DSAs at the time of the survey, splitting them into amounts received up to and including £1,000⁴⁶ and those receiving larger amounts, i.e. more than £1000⁴⁷ shows that:

⁴⁴ Unweighted sample size for all full-time students – n=2982.

⁴⁵ Unweighted sample size for those who received or expected to receive DSAs - n=157

⁴⁶ Unweighted sample size for those in receipt of up to £1,000 – n=70

- 47% of those receiving amounts up to (and including) £1,000 undertook some form of paid work during the academic year and 53% reported doing none during this period.
- 32% of those receiving amounts of more than £1,000 undertook some form of paid work during the academic year and 68% reported doing none during this period.

Attitudes to funding pre entry to higher education

138. SIES contained a limited number of questions in 11/12 measuring attitudes. One question asked students whether the student funding and financial support available to them affected their decisions about HE Study in any way. Those in receipt of DSAs were more likely to say yes to this question (41%) compared to non-disabled students (33%). Of this group the large majority of disabled students who said yes to this question (83%) said they wouldn't have studied without funding. This compares with 68% of non-disabled students who said that their decisions had been affected by student funding and financial support available.

139. However those in receipt of DSAs for less than or equal to £1,000 had attitudes that were similar to non DSAs students, 34% said that student funding and support available to them affected their decisions about study (33% of non-disabled students) and of these 75% said they wouldn't have studied without funding.

140. For the group in receipt of DSAs for higher amounts, i.e. more than £1,000, attitudes were quite different. This time 54% said that student funding and support available to them affected their decisions about study and of these 93% of this group said they wouldn't have studied without funding.

⁴⁷ Unweighted sample size for those in receipt of more than £1,000 – n=48

Impact analysis

Introduction

141. To understand the impact of the policy changes on protected groups we have taken the following three step approach in relation to each of the proposed changes:

- Whether protected groups are disproportionately affected: We have compared the protected characteristics profile of DSAs recipients to the wider HE population to try and examine whether some groups are under, over or proportionately represented in the population of DSAs recipients. Where possible we also consider the characteristics of DSAs students claiming a particular form of support relating to the changes to the DSAs offer, and compare the characteristics against the whole DSAs population. This allows us firstly to examine whether changes to the DSAs package as a whole will fall disproportionately to a particular group and then secondly whether changes to elements within the package could disproportionately affect a particular subgroup of the DSAs recipient population.
- Nature and magnitude of any impact: At the individual level we have tried to analyse whether the impact on a DSAs recipient will be positive, negative or broadly neutral and examined whether or not the nature and magnitude of the average impact is expected to be similar across all protected groups.
- How this affects the equality aims: Finally, we have given specific consideration to how the above analysis reads across to each of the three aims which comprise the public sector equality duty.

Equality aims

142. We have considered the impact of these policies on the need to eliminate discrimination and other prohibited conduct. A general effect is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.

143. We have considered the impact of these policies on the need to advance equality of opportunity between people who share a protected characteristic and those who do not in relation to the proposed changes. We have looked in particular at the need to:

- remove or minimise disadvantages suffered by those who share a protected characteristic,
- take steps to meet the needs of persons who share a protected characteristic to the extent those needs are different, and
- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

144. We have considered the impact of these policies on the need to foster good relations between persons who share a protected characteristic and those who do not share. We have considered in particular the need to tackle prejudice and promote understanding.

145. The general equality duty covers the following protected characteristics: age, disability, gender, gender reassignment, pregnancy and maternity, race and sexual orientation. As disadvantage in higher education is still apparent in connection to family income and economic status, we will also look at the impact on individuals from lower income groups.

146. We have focused our analysis in particular on the protected characteristic of disability since the proposed changes have an obvious and direct impact on persons who are disabled. Following this we also consider the age, gender and ethnicity profile of DSAs recipients, along with a range of measures of disadvantage. We do not have data on gender reassignment, pregnancy and maternity and sexual orientation profile of higher education students.

147. The definition of disability is set out in section 6(1) of the Equality Act, which states that:

“A person (P) has a disability if –

(a) P has a physical or mental impairment, and

(b) the impairment has a substantial and long-term adverse effect on P’s ability to carry out normal day-to-day activities.”

148. This Equality Analysis considers the impact of a number of proposed changes to DSAs. Students currently qualify for DSAs to cover additional expenditure which they are obliged to incur in connection with their course by reason of disability to which they are subject. There is no definition of disability within the Student Support Regulations but we interpret it to apply to students who are disabled within the meaning of the Equality Act and the regulations are being amended to make this clear.

149. All of the proposed changes will therefore have a direct impact on disabled people who are applying for support for a higher education course under the student support regulations.

Changes to the overall package of support

Summary

- A range of changes to specific elements of the DSAs offer have been proposed and considered.
- At the aggregate level the changes to the overall package of support affects disabled students, by the nature of the policy, as the funding is targeted at disabled students.
- The available data suggests that young students (under 21) are also particularly likely to be affected by the overall change to the DSAs offer: compared to non-disabled higher education entrants, DSAs recipients have a younger age profile.
- The proportion of full-time undergraduate DSA recipients awarded the full maintenance grant is higher than for the wider student population who have received some form of student support (47% compared to 43%). This suggests that recipients from low income households could be more affected by the overall changes to the package of DSAs support. Analysis shows that students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background and could therefore be more affected than other groups of students.

150. Paragraphs 33-79 set out in detail the policy proposals under consideration:

- Funding for computers
- Funding for IT peripherals
- Funding for IT consumables
- Funding for textbooks
- Accommodation
- Non-medical helper support

- Support for students with specific learning difficulties
- Funding for human and technological support to meet an identified need
- Registration of organisations drawing down DSAs funding
- Definition of disability

Will the changes to the overall package of support disproportionately affect protected groups?

151. Changes to the overall package of support will have a direct impact on persons who are disabled as this student product is targeted specifically at students with this protected characteristic.
152. In numerical terms the data on the profile of English domiciled entrants to UK HE institutions shows that the majority of entrants in receipt of DSAs are female (see Table 9). However the evidence shows that the proportion of DSAs recipients that are female is similar to the proportion in the non-disabled student entrant population, showing that the potential impacts of the policy changes would not disproportionately fall to female students, similarly for minority ethnic groups. However this analysis does point to the DSAs policy changes particularly affecting young people: the majority of higher education entrants receiving DSAs are under the age of 21 and a higher proportion of DSAs recipients are young compared to the non-disabled student entrant population.
153. The evidence shows that the majority of higher education entrants in receipt of DSAs are from the higher socio-economic groups. The proportion of students from lower socio-economic classes is similar across the populations of non-disabled students, all disabled students and those in receipt of DSAs. This is also the case when considering disadvantage using the measure based on low participation neighbourhoods (POLAR). This suggests that the potential impacts of the policy changes to remove the provision of standard specification computers would not disproportionately fall to those students from low participation areas and lower socio-economic classes.
154. The proportion of full time undergraduate DSAs recipients awarded full maintenance grant is higher than for the wider student population who have received some form of student support (47% compared to 43%). This suggests that there is the potential for students from low income households to be more affected by the policy proposals. As analysis shows that students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, this suggests that these groups could therefore be more affected by the overall change to the DSAs offer.
155. Changes to the individual elements of support are examined separately below to ascertain whether the proposed change could potentially affect other protected groups disproportionately within the disabled student population. To assess the potential nature and magnitude of the impact on protected groups from the proposed changes to the DSAs package of support changes, and the implications for the equality aims, individual elements of support are again considered separately.

Funding for computers

Summary

- Proposed changes to the funding for computers affects disabled students, by the nature of the policy, as the funding is targeted at disabled students.
- Analysis of the available data, albeit limited, suggests changes to the funding of computers will not disproportionately fall to the protected groups defined by age and gender: the protected characteristics profile of the subgroup of DSAs recipients that receive equipment funding does not significantly differ from the profile of all DSAs recipients. There is no significant difference between the two groups in terms of the likelihood of being awarded a full maintenance grant. Due to data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.
- Evidence suggests that the vast majority of students (including disabled students) own a laptop when they arrive at university: it is considered a normal cost of participation in higher education. Most disabled and the vast majority of non-disabled students acquired their device without using sources of student funding relying on savings or receiving it as a gift. However there is an absence of evidence on the technical specification of laptop that students typically have. Although one survey shows around a third of students are using a device which is between three and five years old.
- The nature of the impact on all disabled students of the removal of funding for computers will be negative: if funding is no longer provided through DSAs then all DSAs recipients would need to either self-fund computers or use computer facilities provided in institutions.
- The available evidence points to disabled people from lower socio-economic groups (and in particular those aged 35 and over) being the least likely to have access to computers. This proposal could therefore particularly affect this group of students, who would have, under current practice, received a DSA-funded computer or laptop. In addition students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and could therefore be more likely to face a negative impact than other groups of students.
- Some disabled students will require a tailored Assistive Technology package, which will be more expensive than a standard laptop. Without DSAs support, disadvantaged students, a group who will include relatively more ethnic minority and mature students, may struggle to purchase this for themselves.
- In cases where Assistive Technology is required due to a student's disability, they will be required to self-fund a maximum of £200. We anticipate that the negative impact of this on disadvantaged students will be mitigated by the maintenance grant and institutional bursaries available to them. Institutions will be expected to play their part by providing AT through their IT network.
- The continued provision of DSAs funding towards computer equipment in 2015/16 provides a complement to the provision available through institutions meeting their legal duties under the Equality Act. Our view is that this will limit any adverse impact on the advancement of equality of opportunity.
- Computers are a mainstream part of accessing the higher education environment. Proposing that this is no longer an additional cost to disabled students and expecting institutions to provide mainstream facilities that are accessible to the whole student body may foster better relations between disabled students and those who are not disabled.

Will the policy disproportionately affect protected groups?

156. The policy will have a direct impact on persons who are disabled as this student support product is targeted specifically at students with this protected characteristic.
157. To assess the impact of the proposed changes to this specific element of the DSAs support offer we consider the potential disproportionate effects within the group of DSAs recipients, comparing the characteristics of DSAs recipients affected by the change in computer funding against all DSAs recipients. This allows us to ascertain whether or not the proposal particularly affects a subgroup of DSAs recipients with protected characteristics other than disability.
158. Analysis of the available data suggests changes to the funding of computers will not disproportionately fall to protected groups. DSAs computer funding is allocated under the broader 'equipment' category by the SLC (Table 11).⁴⁸ The analysis shows that the profile of this group of DSAs recipients is similar to the overall DSAs recipients' profile, in terms of gender and age, and therefore suggests the potential impacts of the policy would not fall disproportionately on these groups. Due to data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others. There is no significant difference in terms of the likelihood of being awarded a full maintenance grant.

What is the likely nature and magnitude of the impact on the relevant protected groups?

159. If funding is no longer provided through DSAs then all DSAs recipients would need to either self-fund computers or use computer facilities provided in institutions.
160. However, the evidence shows that computer ownership is common across disabled and non-disabled people. Across the population as a whole there are disparities in access, with disabled people less likely to have access to computers at home, but these disparities are reduced significantly, for those under the age of 35. This is the age group that represents the vast majority of UK domiciled undergraduate students (See Annex 1, Chart 2).
161. More specifically to the higher education population, the available survey evidence by stakeholders and universities points to the vast majority of students owning a computer, and no significant difference in computer ownership between disabled and non-disabled students. There was no evidence of significant differences between males and females. In terms of age, ownership was high for all age groups but lowest (at 84%) for those aged 35 and over.
162. Survey evidence shows that a small majority of disabled students and a significantly larger majority of non-disabled students do not use student support related funding to finance the purchase of their laptops with around two fifths of non-disabled respondents reporting having paid for their device using money that they had saved up, compared with around one quarter of disabled respondents. One fifth of disabled students received their device as a present compared to around one third of non-disabled students.
163. The available evidence does therefore suggest that computer ownership is largely now a normal cost associated with HE study and not an additional cost associated with disability.

⁴⁸ Due to data limitations we cannot assess the specific impact of the changes in computer funding to protected groups, as we are unable to observe the breakdown of equipment spend by computer funding. We assume the overall characteristics of the population that receives 'equipment' funding are similar to the population receiving computer funding.

164. Postgraduates do not receive statutory student support (apart from DSAs), but the wider evidence suggests that the majority will already own a computer: Ofcom research shows that household computer/laptop ownership for working age disabled people is high (74%). There is very little evidence on disabled postgraduate use of technology in particular, but available surveys of students show that postgraduates in general are just as likely to own a laptop as undergraduates.
165. Overall the available evidence suggests that the use of government funding to finance the purchase of standard IT equipment will in most circumstances represent a “deadweight cost” to government, in that DSAs recipients in the absence of government funding for a laptop or computer would have access to one already or would purchase one. The NUS Degrees of Discrimination survey shows that many DSAs recipients use their allocation to buy a laptop, but equally the vast majority of non-DSA recipients are able to find other sources of funds in order to buy a computer (most commonly purchased through own savings or received it as a gift).
166. However the evidence from Ofcom’s research on access to communications technology⁴⁹ does suggest that disabled people from lower socio-economic groups (and in particular those aged 35 and over) are the least likely to have access to computers and other communication technology. While this wider research does not focus on our target population, i.e. disabled students in higher education, we could conclude from this evidence that this proposal could particularly affect disabled students from lower socio-economic backgrounds, particularly those aged 35 and over, who would have, under current practice, received a DSAs-funded computer or laptop. Analysis (p 31, Table 10) shows that students who receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and would therefore be more likely to face a negative impact than other groups of students.
167. There is also an absence of evidence on the technical specification of the computers or laptops which students typically have. It is not therefore clear whether the types of computers or laptops which students typically own are capable of running the sorts of assistive software which are commonly required. The available evidence does however show that the device students use most often for their university work is quite new on average with six in ten (60%) of students using a device which is less than two years old. Slightly more than a third (34%) used a device which is between 3 and 5 years old.
168. Some institutions also offer discretionary funding for students, including disabled students.
169. Given the common ownership of computers, the socio-economic and age profile of DSAs recipients and the data showing similarities between full-time disabled and non-disabled students in terms of their overall income and expenditure our assessment therefore is that this policy proposal will have a limited impact on the majority of DSAs. However, we have considered how any negative impact of this policy proposal can be mitigated, recognising that some student from more disadvantaged backgrounds may be unable to purchase their own computer and may not be fully supported by their institution in 2015/16.

Mitigation

170. We expect institutions to provide improved access to computer equipment. However, institutions are concerned that changes will not be in place for 2015/16. Given the potential impact on students from low income backgrounds the proposal has therefore been revised. The revised proposal is that

⁴⁹ Ofcom, Disabled consumers’ ownership of communications services (2013)
http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/disabled/Disabled_consumers_report.pdf

DSAs funding will be available towards the cost of an individual computer where that computer is required solely due to the student's impairment, and the computer costs over £200. The student is required to fund £200 towards the overall cost of the computer.

171. We believe than any potential negative impact of the policy change will be mitigated by the provision of other government funding through the student support package, alongside provision by institutions under their duty to make reasonable adjustments and other institutional funding, including bursaries.
172. A comprehensive package of support is available as a contribution towards full-time undergraduate students' living costs (including equipment and materials for their course) while attending university. Eligible students can apply for a means-tested Maintenance Grant and a partly mean-tested loan for living costs. All eligible students, regardless of income, can apply for 65% of the maximum loan for living costs. Under the recent higher education reforms the full maintenance grant for low income students living away from home and studying outside London increased from £3,080 to £3,354 and maintenance loans increased from £4,950 to £5,500⁵⁰.
173. Financial aid from institutions in the form of bursaries and scholarships may also be available to students from low income backgrounds and other under-represented groups, including disabled students. The latest available data shows that in 2011-12 institutions spent £386.5m providing financial support to 442,000 students (around 45% of students on full-time undergraduate and Professional Graduate/Postgraduate Certificate of Education courses paying higher fees)⁵¹. In access agreements (confirmed with the Office for Fair Access), institutions set out what they will do to attract students from disadvantaged backgrounds and help them succeed in their studies. This includes financial help such as bursaries and outreach activities. Institutions with Access Agreements estimate that their expenditure on financial support will increase to £396.8m in 2012/13 and from 2014/15 onwards will be just over £460m.
174. Part-time and postgraduate students do not have access to student support for living and other costs. However, there is an expectation that part-time students can support themselves through other means e.g. through work and/or through Department for Work and Pensions (DWP) benefits. Postgraduate students do not receive government funding through student support, with the exception of DSAs, but may access Research Council support and/or, Professional Career Development loans, alongside income from working.
175. Institutions have a duty to make reasonable adjustments to ensure that disabled students are not put at a substantial disadvantage compared with their non-disabled peers. Government provides significant funding to publicly-funded institutions to enable them to support disadvantaged students, including disabled students. In his guidance, the Director for Fair Access has emphasised that institutions submitting access agreements to OFFA need to demonstrate that they have: paid due regard to equality and diversity in designing access plans; considered the impact of activities on protected equalities groups; and detailed how they intend to monitor and evaluate the impact of their access and student success plans on equality and diversity.
176. Institutions can consider their disabled student body and make appropriate adjustments that may remove the reliance on individual DSAs support. For example, one institution is looking to make

⁵⁰ Student Finance England http://www.sfengland.slc.co.uk/media/561725/sfe_fshe_ret_1314_d.pdf

⁵¹ Access agreement and widening participation strategic assessment 2011-12 and National Scholarship programme 2012-13 (in-year) monitoring outcomes
<http://www.offa.org.uk/wp-content/uploads/2013/06/HEFCEOFFA-Joint-Monitoring-Outcomes-Report.pdf>

assistive technology widely available to all students and move away from some software being seen as only useful for students with disabilities. To this end they have recently purchased site-licenses for some software which can be used by all students and have worked to provide training on these packages to their university trainers, including those that provide study skills support for all students. The institution wants to enable students with disabilities to be able to use the software they need on any computer on campus rather than having to use designated 'disability' rooms.

177. Discussions with sector stakeholders and information contained in Access Agreements suggest that many institutions take their responsibilities to disabled students seriously and measures to support disabled students features strongly in access agreements. Evidence from the National Association of Disability Practitioners supports this view. For example, far more institutions now provide Assistive Technology (AT) over the institution's broader network, rather than confining accessible equipment and software to a dedicated Assistive Technology room (see Table 8). However, the same survey shows that level of provision varies between institutions, and more can be done by the majority to catch up with the exemplar institutions.

How will this affect the Equality Aims?

178. We have considered the impact of this policy on the need to eliminate discrimination and other prohibited conduct. A general effect of this and other policies is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.

179. We have considered specifically the impact of this policy on the need to advance equality of opportunity between people who share a protected characteristic and those who do not in relation to the proposed changes. We have looked in particular at the need to:

- remove or minimise disadvantages suffered by those who share a protected characteristic,
- take steps to meet the needs of persons who share a protected characteristic to the extent those needs are different, and
- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

180. Disabled students will continue to receive a wide range of support to enable them to access and fully participate in their higher education learning. The continued provision of DSAs funding towards computer equipment in 2015/16 provides a complement to the provision available through institutions meeting their legal duties under the Equality Act. Our view is that this limits any adverse impact on the advancement of equality of opportunity.

181. We have considered the impact of this policy on the need to foster good relations between persons who share a protected characteristic and those who do not. We have considered in particular the need to tackle prejudice and promote understanding.

182. Computers are a normal part of accessing the higher education environment. Proposing that this is no longer an additional cost to disabled students and expecting institutions to provide mainstream facilities that are accessible to the whole student body may foster better relations between disabled students and those who are not disabled.

Funding for IT peripherals

Summary

- Proposed changes to the funding for computers affects disabled students, by the nature of the policy, as the funding is targeted at disabled students.
- Analysis of the available data, albeit limited, suggests changes to the funding of IT peripherals will not disproportionately fall to the protected groups defined by age and gender: the protected characteristics profile of the subgroup of DSAs recipients that receive equipment funding does not significantly differ from the profile of all DSAs recipients. There is no significant difference between the two groups in terms of the likelihood of being awarded a full maintenance grant. Due to data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.
- The nature of the impact on all disabled students of the removal of funding for peripheral IT equipment will be negative, if that support is not replaced with alternative forms of support or similar support provided through institutions.
- The impact may be greater for those disabled students from low socio-economic backgrounds (particularly those aged 35 and over) who are less likely to own a computer and are less likely to have the additional means to purchase IT peripherals in the absence of DSAs funding. Students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and could therefore be more likely to face a greater negative impact than other groups of students.
- DSAs funding will be considered on an exceptional case basis where alternative provision is either not possible or is not accessible by the student.
- Our view is that this policy proposal will have limited adverse impact on the advancement of equality of opportunity. The provision of better library services and improved mainstreaming of services overall for disabled students will reduce the disadvantage that disabled students may currently experience.
- We conclude that that this policy may help foster good relations between protected groups, insofar as this group of students will have improved access to the facilities available through their institution's libraries and other services, alongside their non-disabled peers.

Will the policy disproportionately affect protected groups?

183. Students will no longer have access to DSAs funding to routinely purchase IT peripherals. This change will disproportionately impact disabled students, given that they are the target group for DSAs and currently receive funding for a wide range of peripheral IT equipment through DSAs.
184. To assess the impact of the proposed changes to this specific element of the DSAs support offer we consider the potential disproportionate effects within the group of DSAs recipients, comparing the characteristics of DSAs recipients affected by the change in computer funding against all DSAs recipients. This allows us to ascertain whether or not the proposal particularly affects a subgroup of DSAs recipients with protected characteristics other than disability.

185. Analysis of the available data suggests changes to the funding of IT peripherals will not disproportionately fall to protected groups. DSAs IT peripheral funding is allocated under the broader 'equipment' category by the SLC (see Table 12)⁵². The analysis shows that the profile of this group of DSAs recipients is similar to the overall DSAs recipients' profile, in terms of gender and age, and therefore suggests the potential impacts of the policy would not fall disproportionately on these groups. Due to data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others. There is no significant difference in terms of the likelihood of being awarded a full maintenance grant.

What is the likely nature and magnitude of the impact on the relevant protected groups?

186. The nature of the impact on disabled students of the removal of funding for peripheral IT equipment will be negative, if that support is not replaced with alternative forms of support or similar support provided through institutions. The impact may be greater for those disabled students from low socio-economic backgrounds who, according to research by Ofcom are less likely to have access to computers and communication technology (particularly those aged 35 and over) and are less likely to have the additional means to purchase IT peripherals in the absence of DSAs funding. Analysis (page 31, Table 10) shows that students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and could therefore be more likely to face a greater negative impact than other groups of students.

187. This proposal is based on the expectation that institutions' library services are equipped to provide support in a variety of ways that will remove the need for some IT peripherals e.g. printers and scanners. Alternative library services could include printing services, provision of e-books to remove the need for hard copy printing or scanning and long library loans. Where alternative provision is not possible or is not accessible for the student, peripherals will still be considered for DSAs funding. Therefore overall there will be minimal impact on disabled students from the policy proposal.

Mitigation

188. DSAs funding will be considered on an exceptional basis where alternative provision is either not possible or is not accessible by the student.

How will this affect the Equality Aims?

189. We have considered the impact of this policy on the need to eliminate discrimination and other prohibited conduct. As set out above, a general effect of this and other policies is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.

190. We have considered specifically the impact of this policy on the need to advance equality of opportunity between people who share a protected characteristic and those who do not in relation to the proposed changes. We have looked in particular at the need to:

- remove or minimise disadvantages suffered by those who share a protected characteristic,

⁵² Similar to the caveat mentioned in footnote 46, we assume the overall characteristics of the population that receives 'equipment' funding are similar to the population receiving IT peripheral funding.

- take steps to meet the needs of persons who share a protected characteristic to the extent those needs are different, and
- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

191. Whilst this policy proposal could have a limited impact on the advancement of equality of opportunity, the provision of better library services for disabled students will reduce any disadvantage that disabled students may experience. Disabled students should expect to have the same access to library provision as their peers. We anticipate improved mainstreaming of services overall and in particular disabled students having easier access to research and journals which are compatible with their assistive technology.

192. We have considered the impact of this policy on the need to foster good relations between persons who share a protected characteristic and those who do not. We have considered in particular the need to tackle prejudice and promote understanding.

193. We conclude that the policy may assist with fostering good relations, insofar as the policy may lead to this group of students having improved access to the facilities available through their institution's libraries and other services, alongside their non-disabled peers.

Funding for IT Consumables

Summary

- The policy will have a direct impact on persons who are disabled as this student product is targeted specifically at students with this protected characteristic. The nature of the impact on disabled students is likely to be negative.
- It is not possible to make a robust assessment of whether the proposed changes to the funding of IT consumables could disproportionately fall to a subgroup of DSAs recipients with protected characteristics other than disability. However the available data does suggest that disabled females, those aged 25 and over and those from low income backgrounds could be disproportionately affected by the changes to the funding of IT consumables. Due to further data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.
- The impact may be greater for students from low income backgrounds who are less likely to have the additional means to purchase IT consumables should they need to in the absence of DSAs funding. Students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and could therefore be more likely to face a greater negative impact than other groups of students.
- We expect the impact to be mitigated in a number of ways, at least partially, by institutions adjusting their access to learning materials to better accommodate the needs of their disabled students.
- A general effect of this and other policies is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.

Will the policy disproportionately affect protected groups?

194. The policy will have a direct impact on persons who are disabled as this student product is targeted specifically at students with this protected characteristic.
195. It is not possible to make a robust assessment of whether the proposed changes to this specific element of the DSAs support could disproportionately fall to a subgroup of DSAs recipients with protected characteristics other than disability. Consumables are funded under the broader DSAs General Allowance category by the SLC (see table 12). This allowance is also used to fund textbooks and other miscellaneous items and can also be used to 'top-up' the Non-medical Help allowance and the specialist equipment allowance.
196. The profile of students in receipt of the General Allowance does differ to the overall DSAs recipients' profile in terms of gender and age: they are more likely to be female and to be aged 25 and over, compared with the DSAs population. They are also more likely to be awarded the full maintenance grant. This therefore tentatively suggests that any potential impacts of changes to funding for consumables would fall disproportionately on these groups. However, it is not possible to draw firm conclusions on whether some groups would be more likely to be affected by the specific changes to the funding of IT consumables. Due to further data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.

What is the likely nature and magnitude of the impact on the relevant protected groups?

197. The nature of the impact on disabled students of the removal of funding for IT consumables is likely to be negative. The impact may be greater for students from low income backgrounds who are less likely to have the additional means to purchase IT consumables should they need to in the absence of DSAs funding. Analysis (page 31, Table 10) shows that students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and would therefore be more likely to face a greater negative impact than other groups of students.

Mitigation

198. However we expect the impact to be mitigated, at least partially, in a number of ways by institutions adjusting their access to learning materials to better accommodate their disabled students, for example, longer loans from their libraries or better access to online publications to remove the need for printed materials. We will be discussing with stakeholders how the use of other resources can be provided to minimise the impact of this proposal on disabled students.

How will this affect the Equality Aims?

199. We have considered the impact of this policy on the need to eliminate discrimination and other prohibited conduct. As set out above, a general effect of this and other policies is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.
200. We have considered specifically the impact of this policy on the need to advance equality of opportunity between people who share a protected characteristic and those who do not in relation to the proposed changes. We have looked in particular at the need to:
- remove or minimise disadvantages suffered by those who share a protected characteristic,
 - take steps to meet the needs of persons who share a protected characteristic to the extent those needs are different, and

- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

201. Whilst this policy proposal could have a limited adverse impact on the advancement of equality of opportunity, we expect this to be mitigated by institutions making adjustments regarding access to learning materials to better accommodate disabled students and remove the need for printed materials. The provision of improved access, such as to longer textbook loans and online publications will reduce the disadvantage that disabled students may experience.

202. We have considered the impact of this policy on the need to foster good relations between persons who share a protected characteristic and those who do not. We have considered in particular the need to tackle prejudice and promote understanding.

203. We conclude that the policy may assist with fostering good relations, insofar as the policy may lead to this group of students having improved access to learning materials available through their institution's libraries and other services, alongside their non-disabled peers.

Funding for textbooks

Summary

- The policy will have a direct impact on persons who are disabled as this student product is targeted specifically at students with this protected characteristic.
- The nature of the impact on disabled students of the removal of funding for textbooks will be negative, if that support is not replaced with alternative forms of support or similar support provided through institutions.
- It is not possible to make a robust assessment of whether the proposed changes to the funding of textbooks could disproportionately fall to a subgroup of DSAs recipients with protected characteristics other than disability. However the available data does suggest that disabled females, those aged 25 and over and those from low income backgrounds could be disproportionately affected by the changes to the funding of textbooks. Due to further data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.
- The impact may be greater for those disabled students from low income backgrounds. They are less likely to have the additional means to purchase additional textbooks should they need to in the absence of DSAs funding. Students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and could therefore be more likely to face a greater negative impact than other groups of students.
- DSAs funding will be considered on an exceptional basis where alternative provision is either not possible or is not accessible by the student.
- Our view is that any adverse impact of the policy proposal on equality aims will be limited. The provision of better library services, including access to alternative format publications, for disabled students will reduce the disadvantage that disabled students may currently experience.
- We conclude that this policy may help to foster good relations, insofar as this group of students will have improved access to the facilities available through their institution's libraries and other services, alongside their non-disabled peers.

Will the policy disproportionately affect protected groups?

204. Students will no longer have access to DSAs funding to purchase text-books. This change will disproportionately impact disabled students, given that they are the target group for DSAs and currently receive funding for non-core textbooks and, on some occasions, core textbooks.
205. It is not possible to make a robust assessment of whether the proposed changes to this specific element of the DSAs support could disproportionately fall to a subgroup of DSAs recipients with protected characteristics other than disability. Textbooks are funded as “consumables” under the broader DSAs General Allowance category by the SLC (see table 12). This allowance is also used to fund IT consumables and other miscellaneous items and can also be used to ‘top-up’ the Non-Medical help allowance and the specialist equipment allowance. The profile of students in receipt of the General Allowance does differ to the overall DSAs recipients’ profile in terms of gender and age: they are more likely to be female and to be aged 25 and over, compared with the DSAs population. They are also more likely to be awarded the full maintenance grant. This therefore suggests that any potential impacts of changes to the funding for textbooks would fall disproportionately on these groups. However, it is not possible to draw firm conclusions on whether some groups would be more likely to be affected by the specific changes to the funding of textbooks.

What is the likely nature and magnitude of the impact on the relevant protected groups?

206. The nature of the impact on disabled students of the removal of funding for textbooks will be negative, if that support is not replaced with alternative forms of support or similar support provided through institutions. The impact may be greater for those disabled students from low income backgrounds who are less likely to have the additional means to purchase additional textbooks should they need to in the absence of DSAs funding. Analysis (page 31, Table 10) shows that students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and would therefore be more likely to face a greater negative impact than other groups of students.
207. However, this proposal is based on the expectation that institutions’ library services are equipped to provide support in a variety of ways that will remove the need for disabled students to personally purchase textbooks. Alternative library services could include printing/scanning services, provision of e-books to remove the need for hard copies and long library loans. Where alternative provision is not possible or is not accessible for the student, textbooks will still be considered for DSAs funding on an exceptional basis. Therefore overall there will be minimal impact on disabled students from the policy proposal.

Mitigation

208. DSAs funding will be considered on an exceptional basis where alternative provision is either not possible or is not accessible by the student.

How will this affect the Equality Aims?

209. We have considered the impact of this policy on the need to eliminate discrimination and other prohibited conduct. As set out above, a general effect of this and other policies is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.
210. We have considered specifically the impact of this policy on the need to advance equality of opportunity between people who share a protected characteristic and those who do not in relation to the proposed changes. We have looked in particular at the need to:

- remove or minimise disadvantages suffered by those who share a protected characteristic,
- take steps to meet the needs of persons who share a protected characteristic to the extent those needs are different, and
- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

211. Our view is that any adverse impact of the policy proposal on the advancement of equality of opportunity will be limited. The provision of better library services, including access to alternative format publications, for disabled students will reduce the disadvantage that disabled students may currently experience. Disabled students should expect to have the same access to library provision as their peers. We anticipate improved mainstreaming of services overall and in particular disabled students having easier access to research and journals which are compatible with their assistive technology.

212. We have considered the impact of this policy on the need to foster good relations between persons who share a protected characteristic and those who do not. We have considered in particular the need to tackle prejudice and promote understanding.

213. We conclude that policy may have a positive effect insofar as this group of students will have improved access to the facilities available through their institution's libraries and other services, alongside their non-disabled peers.

Accommodation

Summary

- The policy will have change will disproportionately affect disabled students, given that they currently receive targeted funding through DSAs.
- It is not possible to make a robust assessment of whether the proposed changes to the funding for accommodation could disproportionately fall to a subgroup of DSAs recipients with protected characteristics other than disability. However the available data does suggest that disabled females, those aged 25 and over and those from low income backgrounds could be disproportionately affected by the changes to the funding of accommodation. Due to further data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.
- We expect there to be no impact on the majority of students. Where adjustments need to be made to accommodation they will be funded either by the provider or by DSAs in the case of private landlords.
- If an institution or its agent is unable to meet its legal obligation to make reasonable adjustments then this may have a negative impact on the student whose accommodation is unsuitable. To mitigate potential impacts we will provide an Exceptional Case Process which will consider individual cases where institutions (or their agents) assert that it would not be reasonable for them to provide appropriate adjustments to accommodation.
- We believe that the policy will assist in fostering good relations between disabled and non-disabled students, insofar as it ensures that disabled students are able to live alongside and share communal facilities with non-disabled students. This is subject to safeguards which ensure that the necessary adjustments will be made in all cases.

Will the policy disproportionately affect protected groups?

214. Students will no longer receive DSAs funding for the additional costs of accommodation provided by an institution or its agent that arise due to the student's impairment. This change will disproportionately impact disabled students, given that they currently receive targeted funding through DSAs.
215. Accommodation spending is funded from the DSA General Allowance. A robust assessment of whether the proposed changes to this specific element of the DSAs support could disproportionately fall to a subgroup of DSAs recipients with protected characteristics other than disability is not possible. The broader DSA General Allowance category is also used to fund IT consumables, textbooks and other miscellaneous items and can also be used to 'top-up' the Non-medical help allowance and the specialist equipment allowance. The profile of students in receipt of the General Allowance does differ to the overall DSAs recipients' profile in terms of gender and age: they are more likely to be female and to be aged 25 and over, compared with the DSAs population. They are also more likely to be awarded the full maintenance grant. This therefore suggests that any potential impacts of changes to funding for accommodation would fall disproportionately on these groups. However, it is not possible to draw firm conclusions on whether some groups would be more likely to be affected by the specific changes to accommodation funding. Due to further data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.

What is the likely nature and magnitude of the impact on the relevant protected groups?

216. We expect there to be no impact on the majority of students: where adjustments need to be made to accommodation they will be funded either by the provider (in the case of institutions and their agents) or by DSAs (in the case of private landlords). If an institution is unable to meet its legal obligation to make reasonable adjustments then this may have a negative impact on the student whose accommodation is unsuitable. We have provided mechanisms for resolving such situations, described below.

Mitigation

217. We are intending to provide an Exceptional Case Process which will consider individual cases where institutions (or their agents) assert that it would not be reasonable for them to provide appropriate adjustments to accommodation. Similarly, DSAs will remain available to fund the additional costs of accommodation provided by private landlords where that cost is not being met from elsewhere e.g. through a local authority personal care plan.

How will this affect the Equality Aims?

218. We have considered the impact of this policy on the need to eliminate discrimination and other prohibited conduct. As set out above, a general effect of this and other policies is that there will be greater onus on institutions to make provision for disabled students in order to comply with their duties to make reasonable adjustments under the Equality Act. This may increase the potential for discrimination by institutions in circumstances where they fail to comply with those duties.
219. We have considered specifically the impact of this policy on the need to advance equality of opportunity between people who share a protected characteristic and those who do not in relation to the proposed changes. We have looked in particular at the need to:
- remove or minimise disadvantages suffered by those who share a protected characteristic,
 - take steps to meet the needs of persons who share a protected characteristic to the extent those needs are different, and

- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

220. Suitable accommodation, of appropriate size and distance from university buildings, is vital to ensure that disabled students are able to participate fully in higher education and engage in learning activities. The policy sets out an expectation that such accommodation will be available to disabled students, and reasonable adjustments will continue to be funded where needed.

221. We have considered the impact of this policy on the need to foster good relations between persons who share a protected characteristic and those who do not. We have considered in particular the need to tackle prejudice and promote understanding. We believe that the policy will help to promote good relations between disabled and non-disabled students, insofar as it aims to ensure that disabled students are able to live alongside and share communal facilities with non-disabled students. This is subject to the safeguards laid out in the Mitigation section above, which ensures that the necessary adjustments will be made in all cases.

Non-Medical Help support

Summary

- The policy proposal would disproportionately affect disabled students, given that they currently receive targeted funding through DSAs.
- Analysis of the available data, albeit limited, suggests changes to the funding of non-medical helper support will not disproportionately fall to the protected groups defined by age and gender: the protected characteristics profile of the subgroup of DSAs recipients that receive non-medical helper funding does not significantly differ from the profile of all DSAs recipients. There is no significant difference between the two groups in terms of the likelihood of being awarded a full maintenance grant. Due to data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.
- The proposal to remove DSAs funding from certain less specialised forms of Non-Medical Help may impact negatively on students who currently receive this form of support.
- The impact may be greater for those disabled students from low income backgrounds who are less likely to have the additional means to purchase replacement services themselves. Students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and could therefore be more likely to face a greater negative impact than other groups of students.
- Students are not expected to be put in the position of needing to purchase replacement services. Publicly-funded institutions are provided with significant government funding to ensure equality of learning opportunities for disabled students.
- Stakeholders raised concerns that institutions would not be ready to meet fully their legal duties under the Equality Act by the start of 2015/16. Given the potential negative impact on students in institutions where support has not been put in place, this proposal is now being scheduled for 2016/17.

Will the policy disproportionately affect protected groups?

222. Non-Medical Help is an important type of support for HE students. Some of the help is highly specialised e.g. British Sign Language interpreters and some is less specialised e.g. note-taking. By definition of eligibility for DSAs the policy change will disproportionately affect disabled students.
223. The analysis shows that the gender, age band and disadvantage profile of students applying for Non-Medical Helper support is broadly equal to the overall DSAs population suggesting that the potential impacts of this policy change will not disproportionately affect other protected characteristic groups. Due to data limitations no assessment can be made of whether some ethnic groups are more likely to be affected by the policy change than others.

What is the likely nature and magnitude of the impact on the relevant protected groups?

224. The proposal to remove DSAs funding from certain less specialised forms of Non-Medical Help may impact negatively on students who currently receive this form of support. It is recognised that students from low income households may be less likely to purchase replacement services themselves. Analysis (page 31, Table 10) shows that students that receive DSAs and are from lower socio-economic backgrounds are more likely to be mature and from a minority ethnic background, and would therefore be more likely to face a greater negative impact than other groups of students.
225. However, we do not expect students to be put in this position. Publicly-funded institutions are provided with significant government funding to ensure equality of learning opportunities for disabled students and there are also wider funding mechanisms, such as Access Agreements, to support students from low income backgrounds.

Mitigation

226. Publicly-funded institutions receive government funding through the Disability Premium to enable them to put in place strategies to support disabled students, including those students who receive DSAs on an individual basis. The Disability Premium in 2014/15 is £15 million. This enables publicly-funded institutions to make improvements in the accessibility of resources and computer facilities which mitigates the need for additional NMH for those disabled students with less complex needs.
227. For example, 81% of institutions provide lecture hand-outs to students prior to the lecture and 45% provide audio recordings of lectures via a centralised system⁵³. These improvements in technology should reduce the need for manual note-takers for disabled students. Personal digital recorders have been available to DSAs students since 2007, and provide even more powerful opportunities for autonomous learning. Video-capture technology is still evolving, but accessible video clips of lectures, with search facilities and time-linked transcripts, hold great potential for assisting disabled students with their learning. Survey evidence from the NADP suggests that institutional provision of assistive technology, especially via communal facilities, is still variable (see page 26).
228. Stakeholders raised concerns that institutions would not be ready to meet fully their legal duties under the Equality Act by the start of academic year 2015/16 and that students applying shortly would have no knowledge of how their institution intended to support them. Given the potential negative impact on students in institutions where support has not been put in place, this proposal is now being

⁵³ Abi James and E.A. Draffan, *Review of technology-based support to reduce the impact of note-taking difficulties on disabled students* (June 2014)

scheduled for 2016/17. This allows an additional year for those institutions with insufficient provision to address these issues.

Support for students with Specific Learning Difficulties (SpLDs)

Summary

- Consultation with stakeholders on this proposal has highlighted that the complexity of a student's Specific Learning Difficulty is related primarily to the impact of the learning environment, rather than the severity of the impairment.
- For the purposes of these reforms, students with Specific Learning Difficulties are assumed to be part of the wider disabled student body that will be affected by the non-medical help proposal and will not be treated as a distinct group – nevertheless, for the purposes of completeness, an impact assessment is set out below.
- The policy would disproportionately affect disabled students given that they currently receive targeted funding through DSAs. A Specific Learning Difficulty is the most common impairment type for disabled students.
- Analysis showed that the profile of DSAs recipients with SpLDs is similar to the overall DSAs recipients' profile, in terms of gender, ethnicity and disadvantage, and therefore suggests the potential impacts of the policy would not fall disproportionately on these groups. However, the data suggests that higher education entrants who have Specific Learning Difficulties and receive DSAs are more likely to be younger than the overall DSAs population, which therefore suggests the policy change may disproportionately fall on younger students receiving DSAs.
- The policy change to remove DSAs funding for students with mild Specific Learning Difficulties would have a negative impact to these students.
- However we do not expect these students to be disadvantaged because of the additional funding given to institutions to ensure equality of learning opportunities for disabled students and wider funding mechanisms, such as Access Agreements.
- Those students who had more severe Learning Difficulties would continue to be covered by DSAs and therefore we would not have expected a negative impact on this group.

Will the policy disproportionately affect protected groups?

229. The policy change will disproportionately affect disabled students given that they currently receive targeted funding through DSAs. As chart 3 shows, A Specific Learning Difficulty is the most common impairment type for disabled students (47% of students with a disability reported this type).

230. We consider the disproportionate effects within DSAs recipients, comparing the characteristics of DSAs recipients with Specific Learning Difficulties that may be affected by the change in funding against all DSAs recipients. Due to limited data we are unable to analyse the specific group of students with mild Specific Learning Difficulties that receive DSAs, but consider the broader group of students with all levels of Specific Learning Difficulties that receive DSAs. The analysis of HE entrants shows that the profile of DSAs recipients with Specific Learning Difficulties is similar to the overall DSAs recipients' profile, in terms of gender, ethnicity and disadvantage, and therefore suggests the potential impacts of the policy would not fall disproportionately on either of these groups (page 31, Tables 9 and 11). However, the data suggests that students who have Specific Learning Difficulties and receive DSAs are more likely to be younger than the overall DSAs population, which therefore suggests the policy change may disproportionately fall on younger students.

What is the likely nature and magnitude of the impact on the relevant protected groups?

231. There could be negative impacts on the group of students with mild SpLDs from the removal of DSAs support. However we do not expect these students to be disadvantaged because of the additional funding given to institutions to ensure equality of learning opportunities for disabled students and wider funding mechanisms, such as Access Agreements. We expect institutions to adapt course delivery to make it fully accessible for students with mild forms of Specific Learning Difficulties, particularly dyslexia, particularly as students with dyslexia are the largest subgroup of undergraduate students reporting a disability. Those students who have more severe Learning Difficulties will continue to be covered by DSAs and therefore we do not expect a negative impact on this group.
232. Consultation with stakeholders on this proposal has highlighted that the complexity of a student's Specific Learning Difficulty is related primarily to the impact of the learning environment, rather than the severity of the impairment. Whilst it is the case that inclusive learning environments and anticipatory reasonable adjustments will remove the reliance on DSAs for some students with a Specific Learning Difficulty, this is unlikely to relate to the severity of their learning difficulty. Therefore, for the purposes of these reforms, students with Specific Learning Difficulties are assumed to be part of the wider disabled student body that will be affected by the Non-Medical help proposal and will not be treated as a distinct group.

Funding for human and technological support to meet an identified need

233. This policy removes 'double-funding' of an identified need, but ensures that specific needs remain catered for by either human or technological support. Therefore, no negative impact is expected on any students regardless of their protected characteristics. Discussions are underway with stakeholders to identify where assistive technology or human support is most appropriate.

Registration of organisations drawing down DSAs funding

234. Organisations will be expected to register with an approved body to ensure a consistent quality in the delivery of services to all disabled students. This change also brings a positive impact to all disabled students overall and disabled students sharing other protected characteristics.
235. Analysis of the representation of groups with shared protected characteristics shows that younger students in particular are more likely to benefit than older students from this policy change. HESA data on the characteristics of disabled and non-disabled students shows that the young age group are overrepresented in the DSAs recipient population (see paragraph 102-105).

Definition of Disability

236. This policy will bring the definition of disability used for DSAs eligibility in line with that used in the Equality Act 2010. The nature of this policy change means that there will be no negative impact for persons defined as disabled under the Equality Act – those persons will continue to be defined as disabled and be eligible for DSAs as before.
237. There will be students who started courses before 1 September 2014 that would not now be eligible for DSAs, as they do not meet the definition of disability within the Equality Act 2010, whereas under the previous arrangements they would have qualified. To mitigate any risk for continuing DSAs students, this change was applied to students applying for the first time for DSAs in 2014/15. Continuing DSAs students will continue to receive the DSAs support already in place for 2014/15.
238. The policy will have a negative impact on students claiming DSA for the first time in respect of their current course who do not have a disability within the meaning of the Equality Act. In the

absence of more detailed information on the characteristics of the group of students affected by this policy change we have based our impact assessment on the data we have on the protected characteristics profile of current DSAs recipients. This data suggests the policy change would not disproportionately affect a specific gender, ethnic or socio economic group. It is acknowledged that as there is a higher representation of young people in the DSAs recipient group than in the non-disabled population and as a result younger DSAs eligible students (as previously defined) are more likely to be affected by the policy change than older students.

239. All new students in 2014/15 who are not defined as disabled under the Equalities Act 2010 will no longer be able to expect additional support in the form of DSAs. The evidence suggests that many more students than those who claim DSAs declare a disability on entering HE. Whilst DSAs supported just around 56,600 full time undergraduate English domiciled students in 2012/13 there over 135,000 students enrolled in UK institutions who had declared a disability. Our assessment therefore is that the policy change should not have a detrimental impact on entry to HE for those new students in 2014/15 who declare a disability not recognised under the Equalities Act 2010 and the nature of the impact of this policy change will not vary significantly across the other protected characteristics of gender, age and ethnicity.

Monitoring and Review

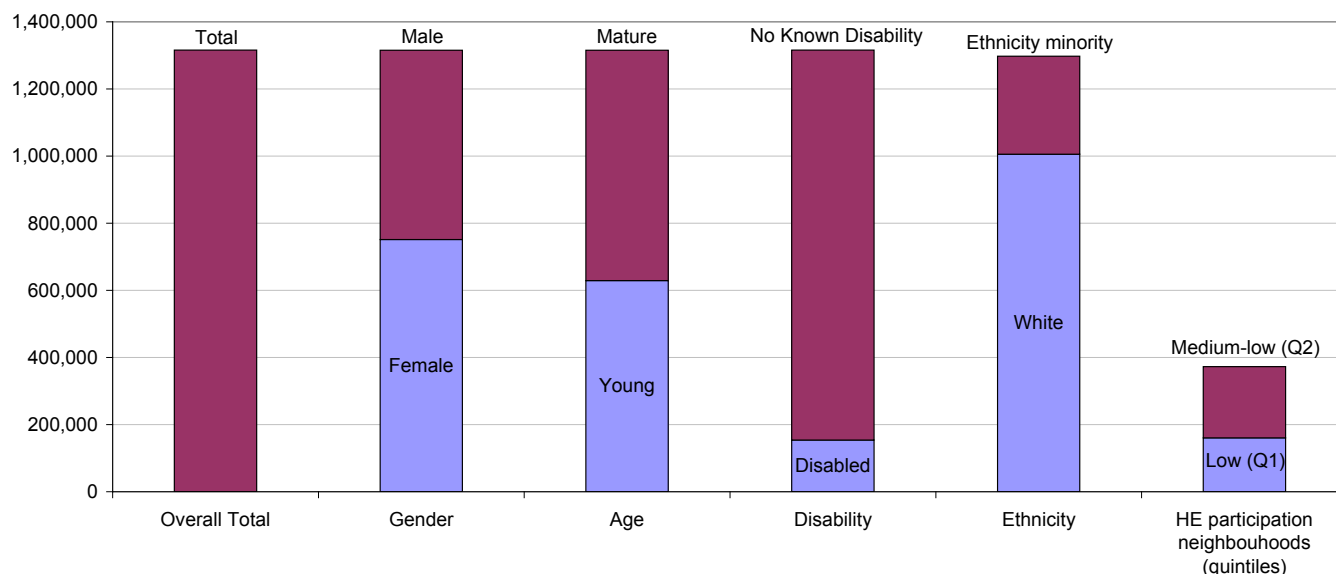
240. We will look for suitable opportunities, including through existing stakeholder forums, to monitor developments and feedback.
241. We shall continue to monitor HESA data and SLC data to determine the participation, retention and outcomes for disabled students, particularly in relation to the following sub-groups of DSAs recipient:
- Female
 - From an ethnic minority background
 - Young students
242. OFFA and HEFCE monitor and publish a report on an annual basis on the outcomes of access agreements and widening participation strategic assessments.

Annex 1 – Snapshot of participation in Higher Education

The charts below provide a ‘snapshot’ of participation in higher education in 2012/13, and a comparison of the student population with the general population in 2011/12 (the year of the last census).

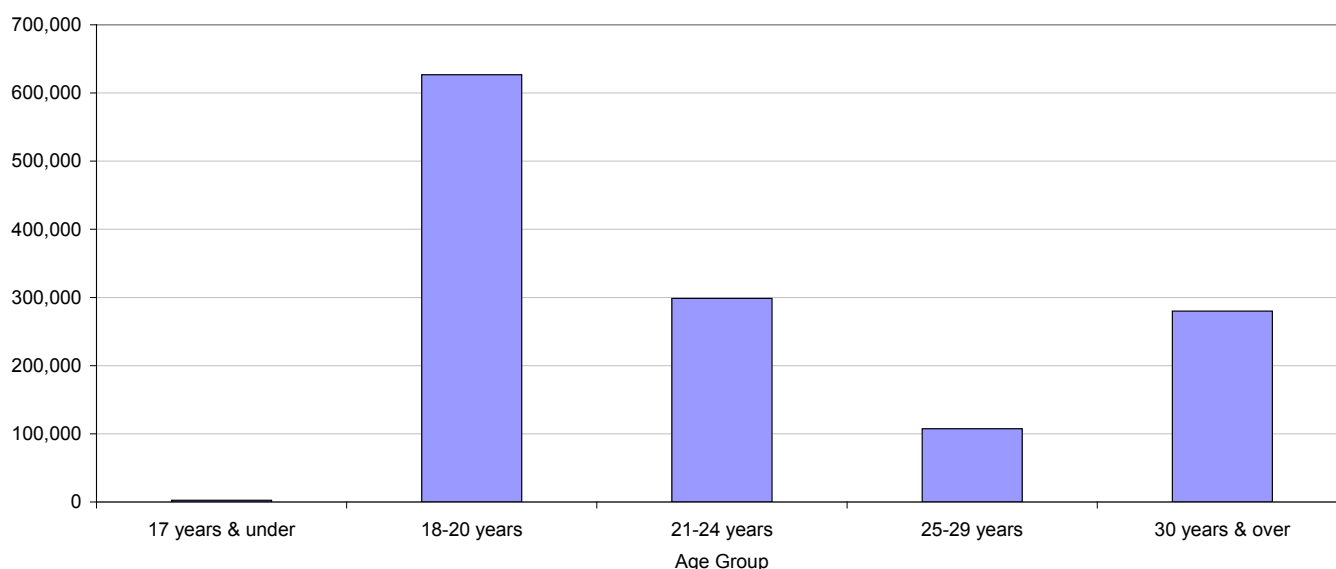
Enrolments – the raw numbers in Charts 1-3 show enrolments broken down by protected characteristics and disadvantaged groups. Source: HESA Student Record (excludes alternate providers).

**Chart 1 - UK Domiciled Undergraduate Enrolments
English HEIs 2012/13**



Source: HESA Student Record (excludes alternate providers)

**Chart 2 - UK Domiciled Undergraduate Enrolments by Age Group
English HEIs 2012/13**



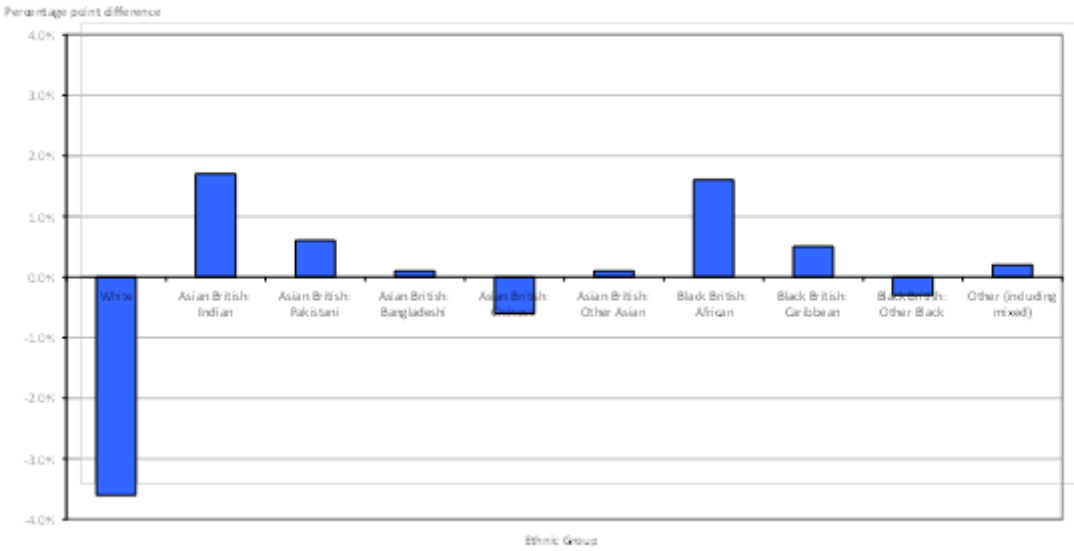
Source: HESA Student Record (excludes alternate providers)

243. Combining English census 2011 data with Higher Education Statistics Agency (HESA) estimates of higher education undergraduate enrolments we can attempt to provide an updated snapshot of the participation of people from minority ethnic backgrounds in English institutions compared with their representation in

the population. The charts below generally show a positive representation in higher education for minority ethnic groups. Young people from Chinese and Black Other backgrounds are the only groups that appear to have a lower representation in higher education compared to their representation in the 18-24 year old population. Compared to the representation of minority ethnic groups in the general population (all ages) only the Black Other group is underrepresented in the higher education population. As a proportion of the higher education population it is students from the 'White' group who are under-represented, in relation to their proportion in the population. (See Charts 4 and 5.)

244. Other research also shows that young people from minority ethnic backgrounds are overwhelmingly more likely to enter higher education compared to White people with the same prior attainment⁵⁴. In addition compared to people from White groups with the same prior attainment those from minority ethnic groups have a similar or higher probability of attending the most selective universities⁵⁵.

Chart 4: Representation of ethnic groups in the UK domiciled undergraduate population compared to the overall population in England aged 16-24
English HEIs 2011/12



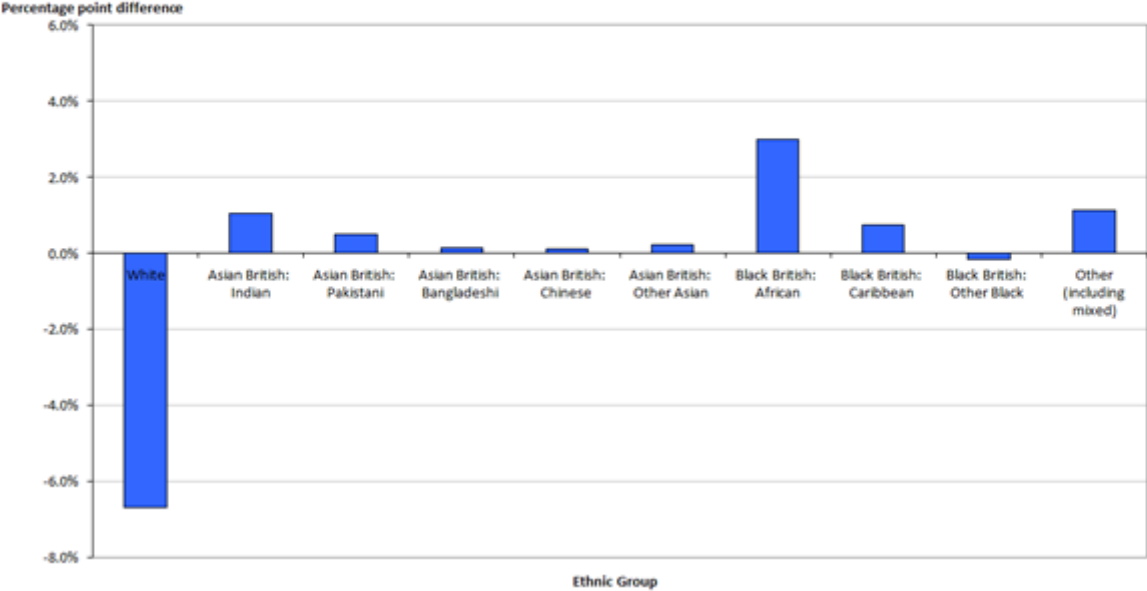
Source: HESA record, 2011 UK Census

⁵⁴ <http://www.education.gov.uk/research/data/uploadfiles/DIUS-RR-08-14.pdf>

⁵⁵ <http://www.ifs.org.uk/publications/4234>

Chart 5: Representation of ethnic groups in the UK domiciled undergraduate population compared to the overall population in England

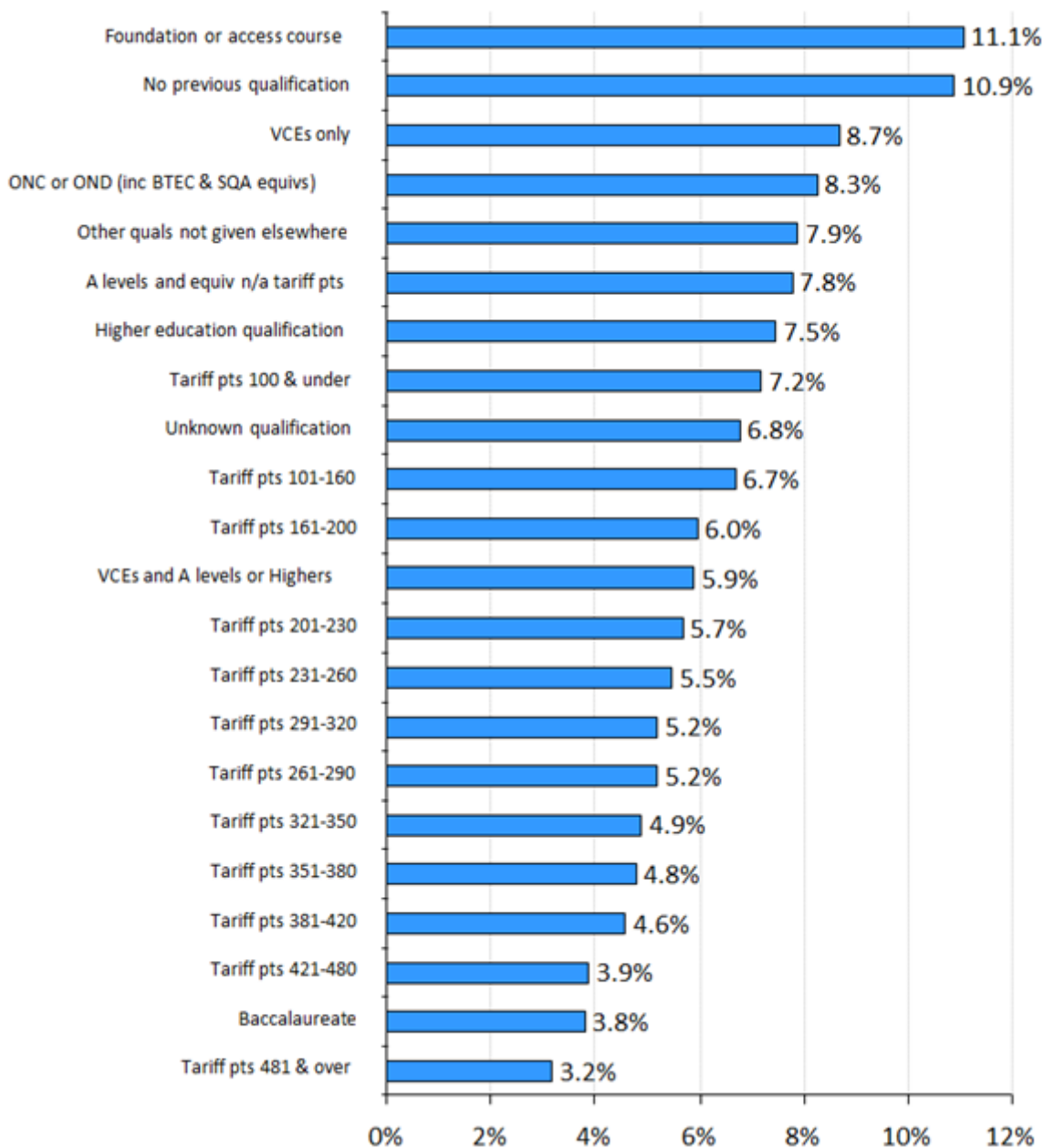
English HEIs 2011/12



Source: HESA record, 2011 UK Census

Annex 2 – snapshot of disabled students’ academic and employment characteristics

Chart 1: Proportion of full-time, first degree students receiving DSAs, by entry qualifications



Note: DSAs recipients are 5.9% of FT, first degree students overall

Source: HESA. Table SD1

Table 1: Destinations of disabled students

	No known disability	Known to have a disability
Full-time paid work only (including self-employed)	48.9%	43.2%
Part-time paid work only	12.3%	12.5%
Voluntary work or other unpaid work	2.2%	3.5%
Work and further study	8.7%	8.6%
Further study only	14.8%	14.5%
Assumed to be unemployed	8.6%	11.7%
Not available for employment	3.3%	4.7%
Other	1.1%	1.6%

Source: HESA. Table 3a - Destinations of leavers by level of qualification obtained, activity, gender, age group, disability status and ethnicity 2010/11

Annex 3 – Current DSAs package of support (England)

Allowance	Maximum amounts		
Study mode	Full-time UG	Part-time UG	Postgraduates (FT and PT)
Specialist equipment allowance (for the duration of the course)	£5,161	£5,161	£10,260 (one allowance for all costs)
Non-medical helper allowance (each year)	£20,520	£15,390	
General allowance (each year)	£1,724	£1,293	
Travel allowance (each year)	Uncapped	Uncapped	

Annex 4 – Summary of responses to BIS regarding changes to Disabled Students' Allowances

BIS received submissions from a large number of stakeholders regarding the proposed changes to DSAs. The department also received correspondence from Lords and MPs on the subject, both expressing their own views and writing on behalf of constituents. These were taken into account during the development of the policy and, where appropriate, evidence was used for this Equalities Analysis. The views and arguments raised in the correspondence are summarised here:

Sustainability of the current system of DSAs

1. Several respondents pointed out that DSAs spending fell in 2013, despite a slight rise in the number of students covered, and that equipment spending has fallen faster than overall spending. According to these respondents, equipment is only a small fraction of the overall DSAs expenditure, but the possibility of funding for Assistive Technology (AT) equipment is what attracts many students to being assessed for DSAs in the first place. However, it should be noted that final figures for DSAs expenditure for 2012/13 is not yet available.
2. There was some recognition by respondents of inefficiencies and waste within the current DSAs spending. It was also pointed out that DSAs was being used on expensive AT where cheaper or even free alternatives have become available. However, many were keen to stress that the majority of DSAs equipment recipients used their AT regularly, and that it contributed to their studies.

Impact of the current system of DSAs on disabled students

3. A few respondents pointed out that disabled people without degrees earn less than equivalently qualified non-disabled people. The value of education to a disabled individual is high, as it gives them much better opportunities. Respondents highlighted the role of DSAs in facilitating disabled students' learning, drawing on research showing that DSAs recipients have better degree outcomes than non-DSAs disabled students, and better persistence (lower dropout) rates. As well as the benefits to the individual, this also provides exchequer benefits through increased tax revenues and lower welfare spending.
4. Many respondents used case studies and statistics to stress the importance of DSAs to disabled students. For some recipients it would not be possible to complete their studies without the equipment, training, tutoring or coaching that DSAs provides them. Respondents also mentioned that DSAs provision can improve self-esteem, improve personal effectiveness and remove barriers for disabled students.
5. Several respondents raised the point that, for some students, DSAs was irreplaceable as a source of finance. Those from disadvantaged backgrounds would not be able to fund purchases of expensive AT equipment without DSAs. Respondents drew on personal experience to point out that many DSAs recipients are in a position of financial hardship, and are not able to work alongside study due to their condition.
6. One respondent drew attention to the particular role of DSAs in supporting students in the arts and other creative subjects, where the incidence of Specific Learning Difficulties tends to be higher and the cost of

specialist equipment (such as technology for design courses) can also be higher than for classroom-based subjects.

7. One MP wrote on behalf of a constituent to say that the assessment process for DSAs was already too arduous, and was not always completed by the time the student had begun their studies.

Response to proposed changes: Funding for Standard IT Equipment

8. Some respondents pointed out that the standard IT provided through DSAs was not a 'free laptop' but an Assistive System, i.e. a combination of hardware and software tailored to a student's disability. Students are unlikely to have the expertise to purchase their own Assistive System even if they can afford to buy one. However, some respondents did recognise that the majority of students already have a laptop on entering Higher Education, and in many cases there is no need for a new one to be purchased through DSAs.

Response to proposed changes: Accommodation

9. One respondent raised concerns that responsibility for making reasonable adaptations to private rented accommodation would not be clearly drawn following the changes. This would be a particular issue for disabled medical students on placements in hospitals and GP clinics, who often stay in temporary, private accommodation during their placement.

Response to proposed changes: Support for students with Specific Learning Difficulties

10. Some respondents were concerned that the proposed changes would remove support from students with 'mild' dyslexia, and felt that in practice it is not easy to draw a distinction between mild and complex needs. They preferred to characterise each student's needs for adjustment and support as being unique. One MP, on behalf of a constituent, raised concerns about the weight being given to the views of sceptics on the issue of dyslexia).

Response to proposed changes: Definition of disability

11. One respondent raised concerns that changing the definition of disability to coincide with that of the Equality Act could be interpreted so that students with Specific Learning Difficulties are excluded. A narrow reading of the Act, which defines a disability as an impairment of 'day-to-day activities', might not consider *study* to be a 'day-to-day activity'.

Response to proposed changes overall

12. In correspondence on behalf of constituents, MPs asked whether those who did not receive support they needed would be able to appeal the decision (either against the DSAs awarding body, or against their institution)
13. Some respondents expressed concern that changes to DSAs would discourage disabled young people from applying to higher education, in the belief that the necessary support would not be available to them.

14. One MP questioned whether support could be delivered efficiently at institutions, especially for low-incidence disabilities with which an institution may not be familiar. The MP noted that the changes ran counter to the trend in other government departments of giving disabled people ‘personal budgets’ which allow them to exercise choice and autonomy.

Consequences for institutions as a result of the proposed changes

15. Many institutions expressed concerns that, by taking responsibility for adjustments and support for disabled students, they would experience a squeeze on existing budgets.
16. Some respondents highlighted the perceived unfairness of ‘punishing’ those institutions who had made the greatest efforts to recruit disabled students.
17. Some respondents also noted that the burden of disability spending would fall disproportionately on small and specialist institutions, such as creative arts institutions, which have small reserves and would not be able to take advantage of economies of scale when providing for disabled students. Consequently, support for disabled students may become unevenly-spread, with some institutions offering more in this area than others.
18. One MP, on behalf of a constituent, raised concerns of an unfair burden on Welsh institutions, which would have to take on additional spending on their disabled, English-domiciled students even though they are not funded by HEFCE, whereas Welsh-domiciled students in England would continue to receive full funding from Welsh public bodies.

Consequences to the Assistive Technology industry as a result of the proposed changes

19. Submissions from AT suppliers and industry bodies raised concerns that cutbacks in DSAs for equipment would endanger the quality of AT provision to students, reduce the after-sales support that AT suppliers could offer, damage the long-term viability of individual firms and threaten the UK’s world-leading role as an exporter of AT and a model of best practice in disabled student support.

Suggested alternatives to the proposed changes

20. Some AT suppliers suggested that disabled students be made eligible for an increased student loan, to allow them to buy AT equipment.
21. Another suggestion was that assessment costs could be reduced by having recommendations for AT software be made in the original DSAs assessment for DSAs eligibility, rather than having the software assessment conducted separately.
22. It was suggested that assistive training costs can be reduced by having software training provided in-house by HEI staff, rather than as a paid extra by AT providers.

Annex 5 – List of Stakeholder-provided Evidence

The Minister and officials received evidence, letters and testimonials from a number of stakeholders. The main evidence considered in this Equality Analysis is provided below:

Association of Dyslexia Specialists in Higher Education

- Various guidance documents: Quality assurance for specialist support, marking guidelines, reasonable administrative adjustments, reasonable adjustments for academic departments, specialist teaching

Birkbeck, University of London

- Breakdown of disabled students and Disabled Students Allowance (as at 20 June 2014)

British Assistive Technologies Association

- DSA Assistive Technology Providers Group, presentation to BIS on 29th May 2014

British Medical Association, Medical Students Committee

- Letter to BIS on 26th June 2014

Buckinghamshire New University

- Henrietta Court “The essential components of Disabled Students Allowance: A survey carried out amongst students at Bucks New University, High Wycombe” (20th May 2014)

Cardiff University, School of Psychology

- Dr Trevor Humby, Lucy Hiscox and Erika Leonaviciute, “The effects of automatic spelling-correction software on understanding and comprehension in compensated dyslexia: improved recall following dictation.” (2014)

GuildHE

- Letter to the Right Honourable David Willetts MP on 2nd June 2014

National Union of Students (NUS)

- Degrees of Discrimination survey (May 2014). Press briefing available at <http://www.nusconnect.org.uk/asset/News/6040/Degreesofdiscrimination-researchbrief.pdf>
- NUS/Endsleigh survey (August 2013). Available at <http://hub.endsleigh.co.uk/2013/august/students-take-over-£2,000-worth-of-gadgets-to-uni/>
- Pound in Your Pocket Survey 2011/12

Randstad

- Impact of funding changes to the Disabled Students’ Allowances, May 2014

Rt Hon Dame Joan Ruddock MP

- Letter to Rt Hon Dr Vince Cable MP on 16th June 2014

University of Surrey

- Nancy Doyle, “Coaching Adults with Dyslexia to Improve Performance at Work”

Universities UK

- Feedback on the DSA announcement submitted on 17th June 2014

Teesside University

- Comments submitted by Prof. Henderson, Vice-Chancellor at the University of Teesside to the Department for Business, Innovation and Skills (22nd May 2014)

WAIS, University of Southampton and British Dyslexia Association New Technologies Committee

- Abi James and E.A. Draffan, Snapshot of disability provision in UK HEIs – May 2014
- Abi James and E.A. Draffan, Review of technology-based support to reduce the impact of note-taking difficulties on disabled students – June 2014

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BIS/14/1108