



# Equality Impact Assessment - Customers

July 2020

Equality Impact Assessment		
Question	Response	
Directorate	Operations	
Department	Disabled Students' Allowances	
Person(s) completing the EIA	Anthony Hill – Targeted Support Manager	
SRO	Mark Cassidy	
Start date of the EIA	24/07/2020	
EIA last updated	08/03/2021	
Name of the policy/process/ decision being assessed?	Obtaining quotes from Assistive Technology suppliers for customers in receipt of Disabled Student Allowances (DSAs).	
Summary of the aims or objectives of the policy/process/ decision and the intended outcomes?	Aims	Outcomes
	We have recently abandoned a procurement exercise for the supply of Assistive technology and training services to customers in receipt of Disabled Student Allowances (DSAs). Whilst work is underway to restructure the tender, we wish to make a change to the existing process of how quotes are obtained from the incumbent suppliers.	The intended outcome is to achieve improved market insight that will inform the design of the new tender. The new tender aims to secure an improved customer experience and better value for the taxpayer.

	<p>There are 10 ATSPs in the market and 3 quotes from these suppliers are provided to us by Needs Assessors for each customer. SLC selects the most cost-effective quote. We intended to make a change whereby it's SLC who obtain quotes directly from the ATSPs. We would continue to seek 3 quotes and would do this on a rotational basis, so all incumbent suppliers have a fair opportunity to bid.</p> <p>As we need to work at pace to deliver a new tender, it was intended to move forward initially with an email process with a view to looking at potential digital solutions to make this more efficient. However, in response to feedback provided during consultation (outlined below under 'external consultation') SLC decided not to proceed with the email process, but instead move directly to the digital solution.</p> <p>The aim of the interim change is to:</p> <ul style="list-style-type: none"> <li>• Obtain data to improve our understanding of the existing market prior to launching a new tender.</li> <li>• Provide some certainty and a fair competitive environment to ATSPs until we complete a new procurement exercise.</li> <li>• Streamline the process of obtaining quotes for all involved parties and introduce more transparency and governance to this part of the process.</li> </ul>	
<p><b>Which department(s) will this change impact?</b></p>	<p>DSA Operations (Targeted Support)</p>	
<p><b>Is further consultation required to</b></p>	<p>No</p>	

<b>identify potential impact(s)?</b>	
<b>What involvement and consultation has been done in relation to this change? (e.g. internal/external stakeholders)</b>	<p><b><u>Internal</u></b></p> <ul style="list-style-type: none"> <li>• Consultation between senior SLC Managers, DfE and WG representatives to agree interim approach.</li> <li>• Consultation with DSA Operational Managers, Workforce Management and Finance representatives to model potential impacts of change.</li> <li>• Consultation with internal Operational staff to test internal processes.</li> <li>• Review of draft EQIA by SLC’s EDI Specialist</li> </ul> <p><b><u>External</u></b></p> <p>Engagement sessions via video calls were held with ATSPs, Needs Assessment Centres and their representative groups on 7 August 2020, in order to take feedback on the proposals. The concerns expressed by attendees, which could have potential downstream impacts on customers and SLC, have been consolidated into 6 key areas below:</p> <p><b>1) Administative burden</b> – it was felt the suggested process of running this manually by email will increase costs for ATSPs as a significant proportion of quotes are currently served via digital solutions. It would be challenging for ATSPs to scale resources to cope with additional demand in the short term, especially in-light of Covid-19 challenges and during peak period. The subject of digital solutions to obtain the quotes to make this process more efficient for everyone was raised by a number of people in the sessions.</p> <p><i>SLC’s view – SLC agreed that the impact of the manual solution could increase costs and be inefficient. We therefore decided to pause and seek investment to move forward with the suggestion of a digital solution instead.</i></p> <p><b>2) Remedial work on quotes</b> – It was highlighted that a small proportion of quotes currently are rejected or need to be ammended after further guidance is sought from ATSPs (i.e issues with compatability). SLC have no visibility of these interactions as the issues are resolved between Needs Assessors and ATSPs before quotes are submitted to SLC. In the suggested interim process, this demand would transfer to SLC, so SLC would need to be mindful of additional resource impacts and potential process delays.</p>

*SLC's view – SLC appreciated this could be an issue that could cause complications in a small proportion of cases. The digital quote solution will maintain the position of the Needs Assessor selecting the products within the system and enables them to continue to seek expertise from ATSP partners should it be required.*

**3) Impacts to relationships** - It was suggested there is currently a good relationship between Needs Assessors and ATSPs and there was a concern the interim process may impair this relationship. It was suggested ATSPs may not be motivated to offer Needs Assessors technical advice anymore as there would be a greater chance of them not being awarded the business. Needs Assessors are also involved informally on dealing with concerns from customers with regards to their equipment. It was suggested the new process of removing Needs Assessor choice may increase more formal complaints to SLC.

*SLC's view – SLC does not foresee this change impairing the relationships between Needs Assessors and ATSPs. In SLC's experience, ATSPs are very keen to share knowledge and best practise. Under the current system, there is already a need for three quotes to be provided to SLC and SLC selects the most cost-effective option. Therefore an NAC having engaged with an ATSP prior to the quotation process does not guarantee them the business currently, so there is no change in this regard. With regards to a potential increase in formal complaints to SLC, we feel this is a low risk and if it is an outcome, we are geared up to handle this through our usual channels. We will also bring any trend in increased complaints about suppliers to the attention of the Department for Education.*

**4) Market share** – There were concerns that the interim process of seeking quotes on a rotational basis could have the effect of rebalancing market share. Some suppliers may have challenges in scaling their operations to match whatever the shift in demand is. This may also cause further challenges when bidding for the revised tender.

*SLC's view – SLC understand this change may result in changes in market share. However, there are many other factors which could also alter market share which in turn, would cause suppliers challenges that they need to adapt to. We do not view this as a reason not to proceed.*

**5) Quality/ Service** – It was suggested that the current process of Needs Assessors having autonomy on which suppliers to request quotes from may act as an informal way of driving higher standards from the ATSPs. This is because if Needs Assessors become aware of service levels which they perceive to be poor, they have the option of not seeking quotes from certain suppliers. There were also concerns about certain ATSPs having particular specialisms and how the new arrangement would not recognise this.

***SLC's view** – The ATSP market is very small – currently only ten registered suppliers, all of whom are required to meet the Quality Assurance Framework (QAF) set by the DfE, which includes being able to provide the full range of (non-specialist) products and services. SLC therefore does not believe there should be significant issues of poor service within this supplier pool, and if there are, these should be raised with SLC/DfE to address directly, rather than be addressed via quotation selection policies/behaviours of NACs. Needs Assessors are responsible for providing SLC with recommendations on solutions they believe to be essential for a disabled student to overcome barriers within Higher Education. If Needs Assessors become aware of poor service being offered by ATSPs, they should bring this to the attention of SLC in the first instance, who will refer to DfE. In terms of the concern about specialisms, SLC understand that all ATSPs can provide the full range of products and services - to the agreed standards. It should be noted that where specialist ergonomic/HI/VI kit is required for customers, the policy of requiring a minimum of one quote will remain.*

**6) Sustainability** - There was a concern with Needs Assessor influence being removed and SLC making decisions on price alone will further accelerate the price war between the ATSPs; ultimately leading to diminished standards and an unsustainable market.

***SLC's view** - It should be noted that agreed service standards continue to remain and the Department for Education (DFE) are monitoring performance and reserve the right to take action in relation to any concerns (<https://www.practitioners.slc.co.uk/media/1760/dsa-qag-closure-information-ssin-08-19.pdf>). It's also important to stress that this is an interim process and SLC are addressing supplier sustainability via a procurement strategy and will return to market in 2021. SLC have established processes in place in the event of suppliers leaving the market and there is a possibility of new entrants into the market, which can be facilitated through the new digital quote tool.*

*Note – the above is a consolidation of key concern themes and is not inclusive of all feedback received in the sessions. A number of process queries and useful suggestions were raised in the sessions that needed to be taken away – for example, a pilot was suggested as a way forward to test the process whilst minimising disruption. There were also some positive comments about the intended change and a desire to assist us further with any data requirements.*

### **Post video calls**

SLC received a number of communications from 3<sup>rd</sup> parties after the video call sessions from attendees. Key themes being:

- It was suggested the significance of some of the risks and challenges put forward by some partners within the video calls were being overstated and that there was actually support for the interim proposal.
- It was suggested SLC obtaining quotes directly is actually preferred as it is more transparent and removes concerning biases being experienced in the current system.
- There were additional views expressed regarding the opportunity and value of digitising this part of the process.

### Competition and Marketing Authority

- On 29<sup>th</sup> January 2021, the Competition and Markets Authority (CMA) published a short statement confirming it has written to a number of businesses involved in the supply of goods and services funded by Disabled Students Allowances (DSAs) asking them to review business practices to ensure they are complying with competition law. Whilst these are only allegations, the CMA is concerned there is a risk SLC has overpaid for certain products/services because some suppliers agreed prices before providing quotations, and customer entitlement may have been impacted. This further strengthens the need for greater transparency around the pricing and quotation part of the process. In response to the CMA concerns, SLC was able to assure the CMA that the changes intended this process would increase transparency over pricing.

**What are the arrangements for monitoring and reviewing the actual impact of the policy/process/decision?**

- 1) We regularly monitor and measure the end-to-end DSA customer process times. The below shows the average customer journey time as of the 24<sup>th</sup> July 2020. This is for the 2019/2020 processing year.

PROCESS STAGES	Stage 1 DSA App Review	Stage 2 Finalise Eligibility	Stage 3 Attend NAR	Stage 4 NAR received by SLC	Stage 5 Review NAR	Stage 6 Finalise Award	Overall Average End To End journey	Student Count
Average number of calendar days by process stage	5 days	45 days	38 days	12 days	12 days	3 days	115 days	36,934

	<p>In the result of the intended change, we would continue measuring and comparing the average customer journey time every month to understand variance from previous cycles.</p> <p>2) We would have open feedback channels to Needs Assessment centres and AT suppliers with regards to the new process and would continue to engage further on possible developments to improve the process.</p> <p>3) SLC run annual customer satisfaction survey's for DSA customers.</p> <p>4) As per the linked SSIN in the previous section, supplier performance will continue to be monitored by DfE.</p>

<b>Which protected group(s) are affected by this change?</b>			
<b>Protected Characteristic</b>	<b>Is there a potential for positive or negative impact</b>	<b>Please explain and give examples of any evidence/data used</b>	<b>Action to address negative impact (e.g. adjustments to the policy/process/decision)</b>
<b>Age</b>	No	No	No
<b>Disability</b>	Yes	<p><b>See consolidation of Stakeholder feedback above.</b></p> <p>Further to the external engagement sessions regarding the change proposal, and notwithstanding the need to quantify the suggested risks on the proposed manual solution, it is accepted there is potential for negative impact to:</p>	<p><b><u>Digital solution</u></b></p> <p>Whilst there was an outstanding requirement to assess the risks associated with the proposed change and consider possible mitigations, based on the feedback received to date, we decided to pause moving forward with the interim proposal as stated (a manual email procedure).</p> <p>Instead, we have brought forward the procurement of a digital solution to manage the process of obtaining quotes directly from ATSPs. This will provide several advantages:</p>

		<ol style="list-style-type: none"> <li>1. The average length of the DSA customer journey.</li> <li>2. Impacts to ATSPs which may manifest in issues for DSA customers and SLC.</li> </ol>	<ul style="list-style-type: none"> <li>✓ minimises administrative impacts to all parties.</li> <li>✓ streamlines the process – a common system all involved parties must use.</li> <li>✓ The digital solution will continue to allow Needs Assessors to select the recommended items from an agreed catalogue.</li> <li>✓ SLC will be able remove items from quotes that are not agreed, which could accelerate the process for some customers.</li> <li>✓ SLC will be able to obtain a quote from all ATSPs for each customer. This is more transparent and provides a fair opportunity to all ATSPs.</li> <li>✓ SLC will have systematic access to key data which will help inform future procurement.</li> <li>✓ In light of the statement from CMA, this will introduce greater transparency around this part of the process.</li> </ul>
<b>Sex</b>	No		
<b>Sexual Orientation</b>	No		
<b>Race</b>	No		
<b>Religion / Belief</b>	No		



<b>Gender Reassignment</b>	No		
<b>Marital/Civil Partnership</b>	No		
<b>Pregnancy/Maternity</b>	No		
<b>All</b>	No		
<b>Evaluation Outcome (tick as appropriate) – refer to guidance notes</b>			
<b>1</b>	<b>No barriers</b>		
<b>2</b>	<b>Stop</b>		
<b>3</b>	<b>Adapt/change</b> ✓		Due to feedback received we have paused implementation of the manual solution and have progressed with a digital

		solution, which will obtain quotes from all registered ATSPs who can meet the customer needs. We will continue to monitor customer experience following implementation.
<b>4</b>	<b>Barriers identified – continue with implementation</b>	

<b>End date of the EIA</b>	TBC – We will continue to assess impacts after the new digital solution launches.
<b>Next review date</b>	31 <sup>st</sup> May 2021