#### Consultation Response Form

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|  | Your name: Grace Krause (Policy Officer)  Organisation (if applicable): **Engage to Change**  Engage to Change is a project run by   * Learning Disability Wales * All Wales People First * Elite Supported Employment Agency * Agoriad Cyf * Cardiff University’s National Centre for Mental Health (NCMH)   Email /Telephone number:  029 20681165  Your address:  Learning Disability Wales  41 Lambourne Crescent  Cardiff Business Park, Llanishen  Cardiff, CF14 5GG  Email: [Grace.krause@ldw.org.uk](mailto:Grace.krause@ldw.org.uk)  Responses should be returned by **17th February 2020** to  Higher Education Division  Welsh Government  Cathays Park  Cardiff  CF10 3NQ  or completed electronically and sent to:  e-mail: [HEDConsultationsMailbox@gov.wales](mailto:HEDConsultationsMailbox@gov.wales) |
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**Question 1:** Do you agree that one allowance would be better than four separate allowances?

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| **Yes** |  | **No** |  | **Not sure** |  |

**Supporting comments**

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| Having more flexibility in the way that DSA is used and allocated would be a positive change for students with more complex needs. Individual students’ support needs will differ significantly from person to person so it is important that available support is not too confined by pre-determined categories.  While merging the four allowances in order to give disabled students more flexibility in how to use support will be a positive step, it is also important to note that this will still leave students in a situation where there is an arbitrary cap on the support they can draw on. Where students need more support than the cap allows for they should be given it. It is also worth noting that the amount of support a student might need will vary according to how accessible their environment is. For example, if universities make lecture notes available in different formats, study skills classes are delivered by tutors trained in understanding different learning styles and university buildings are designed with accessibility in mind, the need for additional support will be minimised.  While we support the plan to merge the four different allowances, we do not support disability-related travel being integrated into this fund. Having travel support is vital for many disabled students in order to access their education. Therefore it is important that the travel allowance is not capped. |

**Question 2:** Could a DSA ‘package of support’ be awarded rather than requiring every disabled student to undergo a study needs assessment?

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| **Yes** |  | **No** |  | **Not sure** |  |

**Supporting comments**

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| We are strongly opposed to replacing individual needs assessments with standard packages. We are concerned that giving disabled students standardised support packages will lead to students receiving inadequate and/or unsuitable support.  Some students will have very specific support needs that they are aware of and are able to request. For example, students who have very straightforward support needs or who have received good support previously. For these students it might make sense to consider not undergoing a lengthy assessment process and offering the opportunity to opt out of this process.  However, neurodivergent students, students with a learning disability or those with mental health difficulties often have support needs that are unlikely to be fully met by a ‘standard package’. Many students also have varying support needs due to the way their disability affects them changes over time and depending on their environment. Ideally, the assessment itself should be a positive experience for the student. The assessment should enable students to explore their support needs and to understand themselves better. Disabled students should be active participants in this process and be educated about what support is available while being encouraged to think about what support would best suit them. Giving students the opportunity to refuse a package and request an assessment is not enough, since many students will not feel confident to do so and they may have concerns about how they will be perceived and treated if they choose this option.  We have reports from several students who have received DSA and have reported that they have been given support that was unsuitable to their needs while being denied things they specifically asked for. Students should have more of a voice in deciding what support will be suitable and appropriate for their needs. It is particularly relevant here that students applying for DSA will also learn from the experience of the process, including that they deserve to be treated with respect, that they are the experts of their own lives and therefore their opinion in deciding what support they need matters. Offering students ‘standardised’ support packages instead could send a potentially very damaging message to students, suggesting that others know more about their support needs than they do, that they are not listened to when they ask for specific support and that they are not in control of what support they receive.  DSA should also be adjusted to how support needs might change over the duration of a student’s course. For example, support needs may change when students do internships. Neurodivergent students and students with additional learning needs in particular might benefit from job coaching where they have one-to-one support in learning the tasks necessary for their new role. In order to ensure that students receive person-centred, holistic support that takes fluctuations in their support needs into account, it is important that the support they receive is regularly evaluated and re-assessed. For some students it is also important for the assessment process to be on-going as they discover what works for them and what does not, as well as the way their disability impacts them changes.  Even students who are generally happy with the support they have received sometimes report that they found the process intimidating and overwhelming. It is therefore important that the process be simplified, and students be guided though the process by student support. Long waiting times too are causing students distress, in part because it means important support is delayed and in part because the waiting itself is stressful. The consultation says one of the reasons that person centred support should be replaced with generic packages is that the assessment process can take up to a year. Welsh Government should investigate the reasons these delays occur and rectify them.  Furthermore, it might also be a good idea to stagger support and establish a system whereby students do not have to have completed their assessment before they start receiving support. Where there are individual bits of support that all students with specific diagnoses tend to get, this support should be made available as soon as the assessment process starts. |

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**Question 3:** Should the student’s HE provider be responsible for arranging DSA funded support?

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| **Yes** |  | **No** |  | **Not sure** |  |

**Supporting comments**

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| We share concerns that commercial interests should be held away from the DSA process, given that profit-making organisations/individuals might not be incentivised to deliver optimal, person centred support.  However, we do not believe that it is appropriate for Higher Education Providers (HEPs) to be responsible for arranging support themselves. Firstly, this would lead to standards varying across Wales, since different HEPs would have different procedures. This would make it harder for Welsh Government to ensure quality is maintained across different HEPs.  There are also concerns around confidentiality and neutrality. One of the biggest barriers to disabled students accessing DSA is concern about discrimination, which often stops students from disclosing their disability or condition. Unfortunately, these concerns are not always unwarranted and in all cases the students’ right to privacy and confidentially must be respected.  We have received multiple reports of disabled students struggling to get reasonable adjustments from their universities, even when they had been previously agreed upon. DSA providers should also be able to support students in these cases. This will be considerably harder if these providers are part of the HEPs they are supposed to be holding to account. |

**Question 4:** Would improving the awareness of DSAs, particularly within schools and the medical profession, increase their uptake,?

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| **Yes** |  | **No** |  | **Not sure** |  |

**Supporting comments**

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| We are strongly in favour of raising awareness of DSA.  It is important that students who have been diagnosed with a disability and/or health conditions are aware of the support that is available to them. However, there should also be an effort made to reach students who are struggling but have not been formally diagnosed. |

**Question 5:** We would like to know your views on the possible effects that these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

1. What effects do you think there would be?
2. How could we increase positive effects and mitigate any negative effects?
3. Are there any other changes you would consider necessary to the policy to ensure the Welsh Language is given parity with English.

**Comments**

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| Consideration must be given to how the process works for Welsh-speaking students, for example, are there enough Welsh-speaking assessors to ensure that waiting times are not significantly longer than for English-speaking students? There are also issues around the lack of Welsh language assistive technologies such as screen reader software that will have an impact on students whose preferred language is Welsh. People with a learning disability whose first language is Welsh are often doubly disadvantaged due to the fact that they may have literacy issues in their first language but are still expected to be able to communicate in a second language (English).  In some cases it might not be possible to give Welsh speaking students the same quality of support as English speaking ones, for example where specific services or software is only available in English. In those cases students should receive additional support to counteract their disatvantage. |

**Question 6**: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments**

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| When it comes to offering disabled students the best support, the quality of support is not only determined by the amount of money available for support but also the type of support available. The support should be based on the social model of disability and providers should assure that all staff involved in assessments and delivering support are trained to understand it.  It should also be noted that DSA is only one part of making HEPs accessible. There are many reasonable adjustments that students may need in order to succeed at university and we know of several cases in Welsh universities where disabled students feel that even where reasonable adjustments have been agreed, these adjustments have not been put in place. Accessibility should be integrated into the everyday business of HEPs, for example asking for different formats of lecture notes/slides, not punishing disabled students for missing classes and not enforcing ableist policies like laptop bans. |

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| Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please complete this box: |