

DSA Consultation Individual Response Analysis

Executive Summary

Background

The Disabled Students Allowance (DSA) was established in 1976 to provide extra financial help for students who have a disability, on-going health condition, mental health condition, or a specific learning difficulty. The allowance provides a grant to enable students to purchase specialist IT equipment or software, and to access non-medical support such as sign language interpreters and note-takers. It also provides help with disability related travel costs.

Currently the Student Awards Agency for Scotland (SAAS) administers the budget for DSA. They make awards to individual students based upon the recommendations made by Disability Advisors at approved Access Centres or Scottish Government validated colleges and universities. (Currently there are 3 access centres, based at colleges in Scotland, who are validated to carry out needs assessments, as well as approximately 28 individual colleges and universities).

In terms of budget accountability, some stakeholders contend that there is an apparent disconnect between the professional assessors and the budget holders, SAAS.

As a result, the purpose of the Consultation was to explore the possibility of bringing budget responsibility closer to those who are tasked with making the assessments of individual requirements.

Following the review, Ministers regard administrative arrangements for DSA as generally fit for purpose. Accordingly, there is no call for either a wholesale review of the purpose of DSA or the rationale for supporting such a scheme.

Response rate

There were a total of 39 responses from stakeholders including colleges, universities, and others such as the National Union of Students (NUS) and charities providing support for students with disabilities. 44% of colleges and 72% of universities, in Scotland responded.

Summary of responses

There were 10 questions in the consultation. The first question asked respondents if they agreed “that budget responsibility should be devolved from SAAS”. The remaining questions centred on how a devolved budget would be set and administered, and the feasibility of running a devolved budget pilot alongside the current model.

Question 1 – Do you agree that budget responsibility should be devolved from SAAS?

There was no overall majority in favour or against the devolution of budget responsibility. 44% were in favour, with 41% against. The remaining 15% either did not answer or were unable to reach a conclusion.

Within the Further and Higher Education sector itself there is a clear split in opinion with 93% of universities who responded against devolution of budget, and 80% of colleges in favour. This division can, in part, be explained by the fact that colleges already administer support for their Further Education disabled students at a local level.

Many respondents expressed concern over the lack of information contained in the consultation paper on the suggested alternative funding model, and felt that further analysis and investigation was needed before any changes were made. Some respondents suggested reviewing the existing arrangements, looking at other aspects of DSA short of devolving budgets.

There were also varying opinions on the need to review DSA at all at this point, with some respondents pointing out the success story that the increase in numbers of students with disabilities at college and university claiming DSA represents. Others reflected on the need to move to a less bureaucratic model.

Question 1.1 – If you disagree what are the disadvantages?

The main disadvantages identified were:

- Changes were not needed.
- There would be an increased administrative burden on institutions, creating resourcing and staffing issues.
- There would be an increase in inconsistencies between support packages at different institutions across Scotland, and within the UK.
- Increased potential for fraud and loss of independent arbitration.
- Potential negative impacts on students.
- Increased potential for conflicts of interest and lack of independent decision making.

Question 1.2 – If you agree, what are the advantages?

The main advantages identified were:

- Improved efficiency in processing DSA applications.
- Simplification of student experience and increased flexibility in the system.
- Procurement advantages, as institutions could take advantage of economies of scale when purchasing equipment.
- Potential improvements to institutional provision and mainstreaming of inclusive practice, enabling progress towards a more “Needs Led” model.
Greater accountability for public funds.

Questions 2 to 6 - How a devolved budget might be set and administered

The key points made by respondents centred on:

- Allocation of budgets: Some respondents highlighted the need to ensure institutions had enough budget allocated so they could ensure students were not disadvantaged and no eligible student was refused support. The majority thought that budget allocations based on historical data such as spend over the previous 1-3 years, as well as numbers of students supported, would be the most obvious solution.
- Increases to budgets should be negotiated with the Scottish Government based on evidence of and detailed forecasts of demand.
- There was concern over how exceptional cases, i.e. where a student required a very high level of support, would be factored in.
- Some respondents felt that some kind of safety net would need to be built-in to deal with increased demands but there was no consensus on how this should be done and various models, such as an in year reallocation and exceptions fund were put forward.
- Access Centres were greatly valued by the majority of respondents and there was a clear consensus that there is a need to protect their role and ensure their funding. Suggestions for funding to be devolved to Access Centres were largely around them having budget awarded to them directly, billing institutions for needs assessments, or continuing to bill SAAS for needs assessments.
- Most respondents were of the view that ring-fencing of funds would be essential, however, opinion was split over whether funds should be protected for the exclusive use of students, or whether funds could be used to cover institutional costs such as reasonable adjustments or administration.

- There is concern, particularly in universities, of the need to protect the funding streams coming from needs assessment fees and Non-Medical Personal Help (NMPH)/training fees, which are currently used by these institutions to fund some staff costs in departments.

Questions 7, 8 and 10 – Proposals for a pilot and timelines for any changes

- There was an evident consensus that if this proposal were to go ahead, a pilot would be required. This would need to take in a variety of sizes and types of institutions to ensure that it was able to identify and iron out the issues which might arise in different settings.
- The majority of respondents didn't want to specify an exact timetable for rolling out a system of devolved budgets, preferring instead to set out what steps were needed first before it could go ahead. Some, however, did set out a timetable and suggested a pilot in 2014-15 with roll-out in 2015-16 if the pilot went well. Others preferred an opt-in system where institutions could take on budget responsibility when they were ready to do so.

It was pointed out that the scale of DSA processes and the issues in universities are completely different to colleges, however there may be some lessons to be learned from the FE experience which may mean it would be easier for colleges to take on budgets, and potentially provide advice and guidance to university.

Question 9 – Role of SAAS/Scottish Government in a devolved budget model

Most respondents thought that SAAS or an independent third party should be in place to handle appeals against an institution's DSA recommendations and there was a continued need for the Scottish Government/SAAS to have an overall oversight of budgets.

Conclusions

As there was no clear consensus the Scottish Government will undertake further engagement with key stakeholders and students to explore a variety of further options, aimed at putting the student and their needs at the centre of the system.

Response Rate¹

The consultation invited responses from a wide range of stakeholders across the sector including universities and colleges. In total, 39 responses were received.

Colleges

10 responses were received directly from colleges and one of those responses was on behalf of Lanarkshire Colleges Federation and Coatbridge College, so these 10 responses represent 12 colleges out of a possible 27 colleges² (44% response rate).

Colleges also fed directly into the response collated by Colleges Scotland. They, together with the College Development Network, held a focus group which included 18 members of staff from various institutions, to shape their collaborative response. It is likely, therefore, that the views of more colleges than the 14 who responded directly are represented.

Universities

13 responses were received directly from a total of 18 universities (72% response rate). An additional response from the Heads of Disability Services group, was included in the university count, as it represents a composite view of the sector and clearly shaped some individual university responses.

Sector representative bodies:

- Universities Scotland.
- Colleges Scotland.
- the BRITE Initiative.
- Education Institute Scotland (EIS).
- Association of Managers of Student Services in Higher Education (AMOSSHE).
- Assistive Technology Advisors Network (ATANET).

Student organisations:

- NUS Scotland.
- Edinburgh University Students' Association.
- The University of Strathclyde Students' Association.

Disability related Third Sector organisations:

- LEAD Scotland.
- National Association of Disability Practitioners (NADP).
- National Deaf Children's Society Scotland.
- Scottish Council on Deafness.
- Scottish Independent Advocacy Alliance.

Individual responses

There was one individual response.

¹ Links to all responses published online can be found in [Appendix 1](#)

² Number of colleges correct as of February 2014 and reflects mergers to date. Note that SRUC is included in official lists of both colleges and universities. For the purposes of this consultation their response has been counted in the college total, rather than the university total.

Analysis of responses to Question 1

Do you agree that budget responsibility should be devolved from SAAS?

Response rate

33 of 39 respondents answered this question, the remaining 6 respondents either did not answer or were unable to conclude whether they should answer yes or no given the information available.

The responses are broken down as follows.

Table 1: Responses to question 1 by respondent type:

Respondent Type	Y		N		Other ³		Total Count
	Count	%	Count	%	Count	%	
Universities ⁴	0	0%	13	93%	1	7%	14
Colleges ⁵	8	80%	1	10%	1	10%	10
Individuals	1	100%	0	0%	0	0%	0
Sector representative bodies	4	67%	1	17%	1	17%	6
Student representative bodies	2	67%	1	33%	0	0%	3
Third sector bodies	2	40%	0	0%	3	60%	5
Total	17	44%	16	41%	6	15%	39

Key findings

There was no overall majority in favour or against the devolution of budget responsibility. 44% were in favour, with 41% against.

Within the Further and Higher Education sector itself there is a clear split in opinion with 93% of universities who responded against devolution of budget, and 80% of colleges in favour.

Sector representative bodies, student representative bodies and Third Sector organisations, were also more likely to be in favour of devolved budgetary responsibility.

A number of respondents also made general comments alongside their yes/no responses. These comments can be broadly grouped into four different categories and are summarised below:

Reason for change

- Many respondents felt that it had not been made clear in the consultation why a change to the current system was being proposed and why this particular model had been suggested. A few respondents also felt that the rationale put forward was, in some places contradictory e.g. in relation to DSA being described as 'fit for purpose' alongside expressed concerns about the rising number of students applying for DSA and the related escalating costs.

³ 'Other' refers to where the question has not been answered at all, or where the respondent has been unable to conclude whether they would answer yes or no.

⁴ Universities in this table includes the response from the Heads of Disability Services group, whose members represent individual institutions and whose response has clearly shaped the responses of a number of universities.

⁵ Including SRUC, SRUC not included in Universities in this table. Also one response from the Lanarkshire Colleges Federation represents New College Lanarkshire, South Lanarkshire College and Coatbridge College.

- Some respondents felt that a fuller explanation of the perceived problems within the current system and why it was felt that a devolved budget model was the best way to address those issues was required.
- Others felt that the consultation document did not provide clear evidence regarding significant problems with the structures and process of DSA, which could be effectively resolved by devolving budgets locally.
- One respondent questioned the fact that previous reviews of DSA, which had made recommendations for improving the system, did not suggest devolving the budget.

Clarity on the proposals

A number of respondents felt that there was not enough information or understanding from the paper how a devolved system could be administered to enable them to fully or partially answer the question. Information they felt was missing (and was necessary to have in advance of coming to a definitive conclusion on the proposals) included:

- Who exactly the budget would be devolved too e.g. would devolution be to individual colleges or to regional level bodies?
- Would the budget be capped or ring fenced?
- Would it remain an individual student allowance?
- Would institutions simply be allocating funds within the current SAAS criteria or would they be allowed to make significant changes in the way DSA is allocated?
- How would the process work for Scottish students studying in the rest of the UK?

Need for further analysis

Many of the respondents commented on the lack of evidence to support the perceived benefits of a devolved budget model. Some made suggestions on what evidence was lacking and how it could go about being obtained e.g.

- Evidence to support the claim in the consultation that there will be no 'apparent change in service delivery' for students.
- Review the existing arrangements to determine whether, and what changes are necessary to bring about desired improvements.
- Full equality impact assessment to assess the possible impact on disabled students of the proposed changes.
- Address and put in place an explicit and transparent funding policy and decision making framework prior to consideration of a devolved model.
- A short-life task group to analyse the current position re the current DSA spend and to consider any trends or uneven spend relating to areas such as, category of impairment, allowance types, place of study etc.
- A benchmarking exercise, to establish current levels of mainstreamed provision for disabled students across the HE sector.

A number of general comments were made including:

- An increase in the numbers of disabled students accessing higher education and receiving DSA is to be welcomed.
- There are many benefits to the existing system e.g. it is well established and students and staff are familiar with the process.
- Processing all applications through SAAS ensures that there is equity of service and a centre of expertise.

Analysis of responses to Question 1.1

If you disagree what are the disadvantages?

Key findings

Given the sectorial divergence in opinions, responses have been broken down by sector.

Universities

The main disadvantages identified by universities can be grouped into the following themes:

Proposed changes are not needed

Respondents made a number of points on this issue including;

- Some respondents were uncertain that the proposed changes would actually result in a 'faster turnaround' of applications, as suggested in the consultation.
- The current funding arrangements for the DSA have worked well for many years.
- This current system has established consistency of approach across the sector and helps to assure the quality of the needs assessment process.
- The current DSA funding model provides disabled students with flexible access to funding to support their individual disability-related needs.
- The vast majority of students in receipt of the DSA are very satisfied with the equipment they have received to support their studies (a number of sources were quoted in support of this including):
 - Draffan, Evans & Blenkhorn, 2007.
 - Viney, Draffan & Wilkinson, 2012.
 - annual SAAS DSA surveys.
 - Recent NUS/LEAD Scotland survey.

Resources & Administration

The majority of universities identified potential resourcing and administration issues for their own institutions as a significant disadvantage to any devolved budget model. Resources (financial and staff) would be need to be set up, trained and managed. Changes to systems e.g. accounting and reporting systems may be required.

General comments:

- There are economies of scale in a centralised system.
- Any devolution of support will replicate what SAAS already does.
- It is more efficient to have one body administering DSA.
- Institutions would have to set up and run different systems for students from Scotland, and the rest of the UK, who were still funded by their own finance agencies.
- Currently, not all HEIs are validated to carry out DSA needs assessments and a system as proposed would have disproportionate effects on smaller and specialist HEIs. If public funds were used to cover these increased costs then there would not be any savings to the public purse.

Inconsistency between institutions

The majority of universities identified the potential for growing inconsistencies in decision making and student experience as a negative outcome of devolving budgets. Many respondents commented on the fact that SAAS, as the single awarding body, ensures a high degree of consistency in decisions across the board. SAAS' role and oversight of the process is highly valued. Without this oversight, increased discrepancies in support packages offered between institutions could occur.

Respondents felt that if budget devolution were to go ahead there would need to be an agreed quality assurance system to ensure consistency of practice across the sector.

Inconsistencies within the UK

A few institutions identified that a new DSA system of devolved budgets in Scotland would mean that the DSA systems would be out of line with what happens in the rest of the UK. They commented that this would have implications, not just for Scottish students studying elsewhere in the UK, but also on English/Welsh/Northern Irish students studying in Scotland. This would result in institutions having to run separate DSA systems for Scottish students and for students from the rest of the UK. Scottish students studying outside of Scotland would have to continue to apply to SAAS for support.

Loss of independent arbitration, quality assurance and fraud prevention

A number of universities commented on the implications of the loss of SAAS' role in the DSA process. They felt that there is a clear need for an independent arbitrator for when a student disagrees with an institution's recommendations, and that SAAS currently fulfils this. Maintaining SAAS as the awarding body of Government funding means students/parents are aware that funding allocation is subject to national parameters and constraints. It also gives the student an independent source of advice and intervention if they are concerned that the institution has not appropriately responded to their needs.

Some respondents suggested that having one agency dealing with all applications means that there are stricter controls and less potential for fraudulent applications e.g. it prevents students applying to more than one institution at a time for DSA.

Conflicts of interest and lack of independent decision making

One institution noted that there is potential for a conflict of interest as institutions become both the provider of support and the auditor of funds, particularly if there is a need to pursue disabled students to investigate fraudulent DSA expenditure claims.

Other (and alternative suggestions)

Some institutions suggested that as an alternative approaches to devolving budgets the Government could improve the current process to enable applications to be approved and funds to be dispersed to students more quickly. Suggestions on how this could be facilitated included:

- Greater reliance by SAAS on the expertise of needs assessors in validated institutions and Access Centres, so that challenges to DSA funding requests are minimised.
- The facility to submit DSA applications online electronic referrals by SAAS.
- A review of the eligibility criteria and the scope of the DSA, including consideration of the provision of funding for all students to purchase a computer at the start of their course.

Colleges

Whilst the majority of colleges were in favour of devolution of budgets, some did identify a number of disadvantages including:

- Devolving responsibility will create more work for institutions and will make them responsible for decisions on their own students, which will remove the previous independent decision making of SAAS.
- The number of students qualifying for funding can vary from year to year, and funds available could be limited in some years, or the College could have an excess.
- If oversubscribed for funding in some years this could affect the financial sustainability of overall College budgets.

- Concerns because funding should be “Needs Led” and what happens if we use the budget and a student needs to apply for Educational support after course has started. Just now we apply for this after to support that need.
- The extra workload required to manage the budget.
- Lack of standardisation and variation in provision.
- Lack of suitably qualified and experienced staff in some institutions.

Sectorial Bodies

The disadvantages identified by sectorial bodies representing colleges and universities largely mirrored the points made by universities and colleges. Additionally the following comments were made:

Resources & Administration

One organisation suggested that the transition to having devolved budgets may be difficult for some institutions and would be best managed through an opt-in solution, whereby institutions could become ‘Validated+’ centres. Institutions that do not initially opt-in would benefit from more efficient SAAS processing times. These institutions would then have greater time to develop their services and implement required changes to become a ‘Validated+’ centre.

Inconsistency between institutions

One organisation is concerned that removing the current safeguarding role of SAAS as decision-maker could make the system potentially more, rather than less, open to abuse.

For students, one organisation commented that a disadvantage is that most universities would not be able to set up third party payments to suppliers who are not already included on the university payment systems. (e.g. taxi companies and IT suppliers), thus reducing the options available to them.

One organisation stated that the fact that decisions are made at-arms-length from institutions according to a single set of policies and procedures is important when it comes to DSA because it gives the scheme credibility; it gives confidence to students that they are being treated fairly.

Student Representative Organisations

One student representative organisation commented on disadvantages, largely mirroring the concerns of universities.

Third Sector Organisations

One Third Sector organisation commented on disadvantages, largely mirroring the concerns of universities with the following additional points:

The ‘disconnect between...assessments and the budget that supports the scheme’ is actually the DSA’s greatest virtue, as it allows those making assessments to be impartial and ensures that the recommendations are not influenced by budget constraints.

They also commented that moving assessment and funding functions closer together risks creating perverse incentives to make recommendations for support which save money, but are not in the best interests of disabled students.

Analysis of responses to Question 1.2

If you agree what are the advantages?

Key findings

Given the sectorial divergence in opinions, responses have been broken down by sector.

Universities

While no universities agreed with the proposal, some did identify advantages of a devolved model. Others suggested that undertaking a DSA review that looked at options short of full budgetary devolution could lead to improvements such as system efficiencies and shorter timescales for students.

The main advantages of devolving the budget identified were:

- A devolved model could make awards directly on the basis of the professional expertise of the needs assessor, and recognise their professionalism more than the current system does.
- Needs assessments would be processed more quickly. The proposals currently under consideration would help simplify the needs assessment process, from the student's perspective.
- In the event that budgetary responsibility was devolved, individual items of equipment recommended for a student could be returned to the institution, particularly in cases where a student withdraws from their course after a relatively short time .

Colleges

The main advantages identified by Colleges can be grouped into the following themes:

Improved Timescales and Efficiencies

- Improved timescales for DSA from initial application to receipt of support.
- More streamlined system.
- Would make it easier to put support in place prior to the students' courses starting.
- Funds could be used to improve equipment held by the institution which could be loaned to students.
- Institutions have less third parties to deal with.
- Efficiency savings resulting in a reduction in overall costs.

Simplification of student experience and increased flexibility

- Students would benefit from having to contact less agencies regarding their DSA application.
- It would introduce greater flexibility into the system, for example removing the need for a cut-off date for applications.
- The current discrepancy in the quality and extent of support provided to advanced and non-advanced students at the same institution could be evened out.
- Equipment could be recalled if students withdrew from their courses early and no longer needed the equipment for educational purposes.

Procurement advantages

- If colleges were able to order equipment on behalf of students it would, potentially, enable them to make savings and agree more competitive rates with suppliers.
- DSA budgets would go further and ensure best value wish scope for regional collaborative contracts.
- Improvements in institutional provision e.g. with institutions could provide loan systems rather than individual purchases of laptops and more expensive technology.

Potential improvements to institutional provision and mainstreaming of inclusive practice

- System would become more equitable and inclusive.
- Could provide more of an incentive for institutions to promote and implement inclusive practice.

Greater accountability for public funds

- Would lead to greater accountability for the use of public funds, with DSA assessors becoming more conscious of spending limited public funds as they would be directly involved in allocating them.
- Would discourage assessors from recommending support/equipment not directly related to learning support needs.
- It may lead to a reduction in the level of DSA funding used.

Sectorial Bodies

The advantages identified by sectorial bodies representing colleges and universities largely mirrored the points made by universities and colleges. Additionally the following advantages were identified:

- Institutions can handle complicated areas such as taxi fares and printing budgets as they are better placed to make informed judgements.
- Less administrative time for institutions liaising with SAAS.
- Improvements to the student experience through simplification of the system.
- Enable colleges to improve their already high quality of support to students.
- The system could be tailored to suit each individual college.
- Closer integration between the DSA and the support that they deliver might encourage a greater engagement and sense of responsibility within an institution for the support of its students.
- Would allow further progress away from a medical model based on diagnosis, to a 'needs-led' model.

Student Representative Organisations

The two student representative organisations in favour of the proposals identified the same advantages in the most part, as the institutions and their sectorial representatives. In addition they expanded on a number of points, in particular around the differing abilities of institutions to provide the back up to students of providing advanced purchase equipment to tide students over until they received their DSA.

One respondent suggested that SAAS case workers do not have the expertise of a DSA assessor in considering a DSA application, which can slow the process down.

One respondent made the point that devolving budget responsibility to an institutional level has the potential to improve student retention rates and help to widen access to education by providing institutions with an opportunity to act more quickly.

Third Sector Organisations

Again, third sector organisations who responded to this question also largely identified the same issues as institutions. They also identified that allowing institutions control over their DSA budget would encourage them to focus more on mainstreaming inclusiveness into day-to-day practice instead of relying on DSA to address any barriers.

Analysis of responses to Question 2

If budget responsibility is devolved, how would this reach the Access Centres?

Response rate

29 respondents replied to this question.

Key findings

Three main funding options identified were:

- Devolve budget directly to the Access Centres.
- Access Centres invoice institutions directly for assessments.
- SAAS retain a budgets to pay Access Centres for assessments.

Comments suggested that the Access Centres play a vital role and that any future funding system should continue to ensure the funding and viability of Access Centres, otherwise the student experience and institutional capacity to carry out the full range of needs assessments could be affected.

The majority of respondents affirmed the on-going value of having Access Centres as part of the DSA assessment system, regardless of whether budgets were devolved or who to.

It was pointed out that having Access Centres also serves as a very cost effective method of maintaining that specialist expertise, as this could not be replicated in every institution.

Budget devolved directly to Access Centres

Seven respondents suggested that budget for assessment fees could be devolved directly to Access Centres in the same way as it might be devolved to institutions. Some of these respondents thought that the Access Centre could also hold the support budget for the students it assesses as well as the assessment fee, others felt that this would be better left with the institution.

Institutions pay Access Centres for assessments

Eleven of the respondents suggested that institutions should be invoiced by the Access Centres directly for any needs assessments they carry out on their behalf.

Some respondents made the point that if the DSA budget responsibility is devolved to institutions, their DSA funding allocations should include additional funds to cover the cost of Access Centre needs assessment fees, fees charged by any other external organisations that institutions utilise to support the needs assessment process, and the fees charged by validated institutions undertaking their own assessments.

SAAS retains budget to pay for assessments

Six respondents suggested that SAAS (or another independent central body) retain the budget to pay for assessment fees, with the Access Centre invoicing SAAS directly, rather than the institution.

Other

A number of respondents suggested a review of Access Centres, particularly in the light of college regionalisation, with some advocating the creation of regional Access Centres.

One respondent was of the view that all students should have the choice of whether to be assessed by their institution or an Access Centre. Another respondent suggested that external DSA equipment

suppliers may wish to carry out DSA needs assessments, however foresaw significant issues around conflicts of interest.

BRITE also commented on the importance of their role within the wider assessment process.

Analysis of responses to Question 3

If a budget was to be devolved how should this budget be set?

Response rate

31 respondents replied to this question, either directly, or as part of their response to question 1.

Key findings

A number of institutions commented on the difficulty of predicting future spend due to fluctuations in the number of students with disabilities and in the types of conditions and support requirements these students may have.

There was general agreement that whatever model was used, students should not be disadvantaged by institution budgets running out and that additional contingency funding should be available if required.

A number of suggestions for different budget setting methodologies were made and these are summarised below:

Using historical data on DSA spend/student numbers

The majority of respondents thought that allocating budgets on the basis of historical data was the most obvious solution. One respondent suggested that an additional percentage should be added on top of the basic allocation, as contingency to be used for unexpected claims and returned if not used.

One institution suggested a more detailed formula based around historical data and identified a number of factors which could be contained in an annual bid for funding, including: the estimated number of HE students with a disclosed disability, number of applications for DSA over the last 3 years, the estimated cost of running the system.

Two respondents identified that a possible downside of setting a budget based on historical data was that it could potentially penalise colleges or universities where an effective and inclusive student support service is in place and fewer students, therefore, needed to apply for DSA.

Pro-rata based on numbers of students at an institution

Two respondents suggested that budgets could be set according to the number of funded places allocated through each institution's main teaching grant, or a national average per head of population, proportionate to the institution's population.

Other

A few respondents suggested that the budget setting process would need to be more sophisticated than just being based on historical data and would need to in some way account for the differences in support requirements from one year to the next. This could include the incidence of disability in the general or HE population and other equality indicators.

A few ideas that fell short of full devolution were also proposed. These included institutions authorising DSA claims but then drawing down funds from a central source as required, rather than being allocated a specific sum i.e. devolution of DSA assessment responsibility but not funds.

Some respondents thought that further analysis and research was needed before any formula could be devised.

One respondent thought that SAAS should retain budget for costs that would be difficult to determine on the basis of historical provision, such as travel.

Some suggested the Discretionary Funds model may be a good place to start when devising a funding model.

Analysis of responses to Question 4

Within an institution would it be necessary to protect (ring-fence) budgets allocated for the purposes of supporting students with a disability? Would it be necessary to stipulate that budgets could only be used to support students and not to e.g. meet staff costs or other 'reasonable adjustments'?

Response rates

33 respondents replied to this question; of these:

- 29 respondents thought that DSA budgets should be ring-fenced in some way. This was further broken down as follows:
 - 3 respondents agreed with ring-fencing but did not specify whether the DSA funds should be ring-fenced just to support students or whether institutional costs could be included.
 - 17 respondents thought that DSA should be ring-fenced with the explicit purpose of supporting students i.e. DSA still attaches to the student.
 - 9 respondents thought that DSA should be ring-fenced to support students and also to allow institutions to recoup administrative costs or make institutional changes or reasonable adjustments.
- One respondent thought that if it was stipulated that DSA was used to benefit disabled students then no further ring-fencing was required.
- Three respondents did not comment on whether ring-fencing was desirable or not but stated that it was a decision for the Scottish Government.

Key findings

Those in favour of ring-fencing generally felt that detailed guidelines would be required to outline how money could and should be used.

Ring-fencing for students

Some respondents pointed out that institutions are obliged, under the Equality Act, to make reasonable adjustments – which they currently do from existing budgets – and that this should continue to be the case. They felt it would be essential to ring-fence DSA budgets to ensure such funding was spent solely to meet the needs of individual disabled students and to distinguish this from colleges' Additional Support Needs for Learning funds (ASNLF) and universities' Disabled Students' Premium allocation (DSP), both of which are used to help meet the cost of reasonable adjustments.

A number of institutions made the point that they felt that DSA – and any equipment bought using these funds – should continue to be 'owned' by the student rather than them having to return equipment to an institution.

It was suggested by a couple of respondents that DSP funding should be tightly ring-fenced too, to protect it and ensure it is used as intended, with DSA then being used as a top up for individual students.

Some felt that flexibility should be permitted, however, to enable institutions to best manage the delivery of support and to decide how DSA funding is allocated to individual students so, for example, that they could take advantage IT procurement arrangements.

Ring-fencing to include institutional provision

Two respondents thought that this should include reasonable adjustments or other institutional changes which allow institutions to operate more inclusively.

However, most of the respondents focussed on the need for DSA to include funding for administrative and staff costs, such as the development of new systems for DSA auditing and administration, appointing additional staff, and maintaining the income streams currently generated by needs assessment charges and in-house provision of NMPH/assistive technology training.

A number of respondents thought that institutions would struggle under the current economic circumstances, to meet the additional administrative costs a change in budget regime would incur and it would be unfair for them to be expected to do so without being able to claim them from the DSA budget.

A number of respondents thought that consideration should be given to how flexibility could be created for DSA funds, e.g. around collective bargaining.

One respondent did not support any proposals for a ring-fenced pot of funding.

Analysis of responses to Question 5

Devolved budgets would be set in advance. How would budgetary increases be negotiated?

Response rate

30 respondents replied to this question.

Key findings

In the answers given there was a significant overlap to the answers proposed in question 3. There seemed to be some confusion amongst the respondents replying to this question as to what the question actually referred to, with some responding on how year-on-year increases would be negotiated and others answering on the basis of who would do the negotiating.

How in-year increases would be negotiated

The majority of respondents interpreted the question as referring to year-on-year increases. Most who responded in this way thought that increases should be negotiated based on evidence of need and forecasts of increased future demand; taking into account previous years spend and other factors such as inflation.

There was disagreement over whether a pro-rata Full-Time Equivalent (FTE) per head formula would be acceptable. A number of institutions pointed out the difficulty of variation in need at small institutions, or that sometimes a disproportionately large amount of budget could be taken up by a small number of students.

Some suggested that in-year reallocations similar to the Discretionary Fund model could be considered but with flexibility built in. Other suggestions reflected the need to take into consideration exceptional cases, with either an additional contingency payment up front, additional in year funding, or SAAS retaining a top-slice as an exceptions fund. There is considerable overlap between these suggestions and those made in question 6.

Who should do the negotiating?

Respondents recommended that it would be a matter for discussion between the Scottish Government and institutions and suggested further analysis and clear evidential requirements be undertaken as part of the negotiating process.

Analysis of responses to Question 6

What sort of safety net would be required in order to support institutions dealing with exceptional cases? E.g. a scheme developed along the lines of Discretionary Fund allocations with in-year re-distributions? Retention of a top-slice by SAAS with a view to further demand-led allocations?

Response rate

32 respondents replied to this question; of these:

- 7 respondents favoured a discretionary fund type system with an in-year distribution.
- 11 respondents thought that having a top slice held by SAAS would be the best model.
- 10 respondents stated that some kind of exceptions system or emergency fund would be needed, funded from the SAAS top slice.

Key findings

Respondents emphasised the need to protect DSA funds from an overall reduction, and that DSA support should not capped.

Both of the options suggested in the question were considered feasible by respondents (and some respondents suggested more than one solution in their responses). Others thought that either the status-quo should be retained or that a pilot should be used to determine what type of safety net would be the most appropriate for a devolved budget system.

Whichever model they favoured, respondents suggested that additional funds should always be available in some form, so that institutions would not be forced to make support decisions based on whether or not there was enough budget left.

Those against a discretionary style in-year redistribution felt that it might create an incentive for institutions to spend their DSA allocations, rather than having to return excess funds. Those against a top-slice/exceptions fund model commented that it appears to defeat the object of devolving budgets and would also potentially introduce delays to students receiving support, if the institution had to apply to an exceptions fund.

Analysis of responses to Question 7

Are there aspects of this proposal that would justify a pilot approach, i.e. running "local budgets" at one or two sites alongside the traditional SAAS model for a period? Or is this proposal straightforward enough that it could be introduced universally from the start?

Response rate

31 respondents replied to this question; of these:

- 29 said that a pilot would be necessary.
- 2 felt a pilot would not be required.

Key findings

The overwhelming response to this question from respondents, regardless of whether they agreed with the principal of devolving budgets, was that if this proposal did go ahead, it would be essential to pilot it first.

Various comments were made on how a pilot should operate, how many institutions it should include and for how long it should run. There was a general consensus that a broad range of institutions should be included, given the variations in size and numbers of students with disabilities. Respondents also commented that a pilot would provide the opportunity to iron out any issues with the new model.

A suggestion was made that, following a pilot, institutions could then opt-in to the new model rather than having a complete roll out across the sector.

Of the two respondents who thought that no pilot was necessary, one was of the opinion that a central DSA fund should remain, therefore, a pilot would not be required, and the other felt that no pilot would be required if institutions were given ample notice of the introduction date of the new model and SAAS provided detailed guidance of what would be expected from institutions.

Analysis of responses to Question 8

Support for students with a disability studying at the FE level is already administered locally. Is there a crossover here which means that institutions where this already happens are already well placed to include HE support in their local budgetary arrangements?

Response rate

19 respondents answered this question.

Some Universities and voluntary/student associations/representative bodies stated that they didn't answer because they felt they did not understand enough about the FE model to comment on how applicable it would be for universities.

Key findings

There was a mixed response to this question.

There were some suggestions that this could also lead to a more streamlined service for students and staff. However, there was acknowledgment among respondents that universities face a very different set of issues to colleges, especially in terms of the numbers of students claiming DSA, so it may not be applicable.

A few responses commented on the fact that while the paperwork required and the initial part of the process FE and HE is similar, later on in the process both models aren't always compatible e.g. FE student support belongs to the college and is discretionary, opposed to the DSA which belongs to the student and is an entitlement.

However, some colleges were of the view that the processes may be transferrable and that they may be in a position to share expertise across both colleges and universities.

One respondent suggested that as one model may work at college but not at university consideration should be given to running two different models in parallel.

Some respondents thought that devolving funding to a local level could allow some anomalies to be resolved in colleges, as there are currently students at the same institution with similar support needs receiving different amounts of money due to their level of study. However, other respondents disagreed and thought these anomalies could only be resolved if FE and HE disability funding worked in the same way.

Analysis of responses to Question 9

In the event that budgetary responsibility was devolved, what would be the on-going role of SAAS/Scottish Government, e.g. continuation of the Validation Panels? Monitoring standards of assessment? Handling appeals?

Response rate

35 respondents answered this question.

Key findings

The responses to this question can be grouped into the following themes:

Oversight of budgets

Most respondents identified a role for SAAS and the SG in continuing to provide an oversight of the DSA budget to ensure that the needs of disabled students are met, to support those administering the budget and to ensure consistency of student support across the sector.

A number of respondents stated that the new system would need to have checks in place to make sure funds were spent appropriately e.g. through auditing, monitoring and reviews. They thought SAAS should have a role in this and in providing analysis of DSA spend to the SG and the sector. As part of this, SAAS and the SG would need to provide clear guidance on what DSA money can be used for as well as guidance on the audit process.

Quality Assurance of Assessments

Respondents thought that the SG should have a continued role in the quality assurance process of needs assessments. However, views were mixed over whether SAAS should continue to play a role, with some expressing the view that caseworkers at SAAS do not necessarily have the professional expertise to review recommendations.

A number of suggestions were made for improving the quality of the needs assessment process, for example peer review by institutions and closer monitoring of needs assessment reports and the provision of non-medical help. A pilot scheme was suggested to determine the most appropriate forms of quality assurance.

One respondent proposed two new panels, one to peer review needs assessment reports, identify good practice and handle appeals and the other to develop guidelines on appropriate equipment and deal with requests for 'unusual items'.

Continuation of the Validation Process

The majority of respondents were supportive of the current validation process and the roles of SAAS, the SG and sector experts in this. It was recognised that the validation process has been cited as a model of good practice by others in the sector.

Some suggestions were given for further development of the validation panel e.g. increasing the authority for the validation panel to audit institutional provision and make recommendations for change, an enhanced role in sharing good practice, and supporting more consistent and mainstreamed/inclusive provision.

One respondent felt that there would be little need for a Validation Panel if budgets were devolved and that institutions should be responsible for their own quality assurance.

Appeals – the role of SAAS

The majority of responses favoured SAAS in the role of independent arbitrator to consider appeals under a system of devolved funding. Other suggestions were for BRITE, the validation panel or Access Centres to take on this role. Two respondents thought that each college should have their own appeals process with SAAS in a supporting role.

Other

A few respondents thought that it would be helpful for there to be support in place for institutions to make the transition to a devolved model of funding, through the provision of a helpline, an advisory group and publication of good practice examples.

Analysis of responses to Question 10

If a change to the way that budgets are managed was introduced, when do you think this should take effect from?

Response rate

34 respondents replied to this question; of these:

- 11 respondents felt that 2015-16 was an acceptable timescale.
- 2 respondents thought 2016-17 was feasible.
- 21 respondents did not give a specific timeframe.

Key findings

A number of respondents felt that several areas would need to be considered before any roll-out timetable could be agreed, e.g. what administrative systems would colleges and universities need to put in place, development of clear guidance and training and set preconditions that all HEIs would need to meet.

Some respondents suggested that a gradual opt-in system was preferable to a universal roll-out. Many felt that a full pilot should be run and evaluated before any roll-out.



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