

## **Equality Impact Assessment – DSA Procurement reforms**

On behalf of the Welsh Government, the Student Loans Company (SLC) have embarked on a number of changes to the process by which eligible Welsh students are assessed for, and receive, certain items of study support funded by their Disabled Student Allowance (DSA).

The most significant change is to procure a framework of services for the supply of study needs assessments and the supply of specialist equipment and associated assistive technology training. This process change will also allow SLC to address a number of the key points students have raised as barriers to the DSA process and for the process to be streamlined to enable support to be received more quickly.

The process change will only affect eligible disabled students applying for undergraduate or postgraduate DSA support through the Student Finance Wales (SFW) service. The change is also being introduced for the Department for Education (DfE) and their Student Finance England (SFE) service.

SLC are procuring contracts for both Wales and England through one procurement exercise.

The procurement exercise will have no impact on Welsh DSA Policy, or on student's eligibility or entitlement to DSA. The exercise aims to enhance students' experiences of the DSA process, improve value for money for the student and taxpayer and to bring oversight and better control of quality of service to students.

### **Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.**

DSA is an additional support allowance paid to eligible disabled students on top of their other student finance to help them with the essential study related costs incurred as a result of their disability. It is paid as a non-means tested grant.

Currently, once the student has been deemed eligible for DSA by SFW (evidenced that they have a disability in accordance with the definition contained within the Equality Act 2010), they are responsible for arranging their own study needs assessment to determine what support is necessary to ensure they can participate in their studies on an equal basis. Following this assessment, a report is compiled and sent to SFW for approval. Post approval, the student is notified that they have been awarded support in line with the report recommendations and they are again responsible for arranging the supply, delivery and timetabling of any support needs agreed for the academic year. The current arrangements only permit SLC to pay the selected providers on behalf of the student. Due to the structure of the arrangements, it is difficult for SLC to impose any additional requirements onto the suppliers of the assessment, equipment and training services to help remove some of the administration in the process. By replacing the current arrangements with formal contracts, the SLC can set out very clear and demanding requirements of service

providers. The design of the contract will see a proactive approach taken to arranging needs assessments, assistive technology and training support for students. The responsibilities currently placed on students to arrange these themselves and directly with separate suppliers will be replaced by a 'one-stop-shop' service arrangement where the supplier will lead the student through the process and make arrangements on their behalf. This will remove the pain points students have highlighted as causing them the most work and frustration. These pain points are also the cause of the delays which result in the current process taking over 100 days to complete.

***How will the proposal promote equality?***

The sole purpose of DSA is to create equity of access to Higher Education study. Equity of access to study is achieved when disabled students are given the right equipment and support to ensure they can participate in their studies alongside non-disabled students. DSA will pay for the additional study-related costs not met by the Higher Education Providers legal duties. DSA is routinely promoted by the SFW service throughout the year and intensified prior to the launch of each academic year application cycle. By placing the responsibility for arranging the support needs onto the contracted supplier, each student will benefit from a consistent, quality service. The differing impact that student's impairments or health conditions have on their ability to successfully progress through the DSA process will be removed with the administrative burden shifting to the contracted supplier. This will create a more equal approach to the process for students.

***What are the possible negative impacts on people in protected groups and those living in low-income households and how will you mitigate for these?***

DSA is only awarded to students who have a physical or mental impairment as defined by the Equality Act 2010. Disabled people may identify with one or more of the protected groups. Research conducted by the SLC in relation to the proposed process change looked only at customers/students with a physical or mental impairment. While data is collected for equal opportunities monitoring, this is held separate to information identifying the impairment and as such, did not form part of the research. While we do not expect the change to have a negative impact, there is a lack of evidence to show if the change will have any unintended consequences for individuals with more than one protected characteristic. SLC will be monitoring the roll out of the new process and will highlight any unintended consequences at the earliest opportunity.

No research has been carried out in relation to the household income of students receiving DSA as DSA is not an income assessed allowance. The amount of DSA available to a student is based on their study support needs. Support is not pro-rated for part-time study or reduced for postgraduate study. This ensure that students studying at 25% or more intensity, or who study alongside their other commitments, receive access to the same level of support as those studying full time. It is recognised that the student's needs do not

change subject to the amount of time they spend studying, and while there may be some difference in the needs of students at different levels of study, maintaining the maximum support through to postgraduate study provides assurance for students. There is a maximum upper limit to the annual amount of DSA one student can receive in an academic year, set for academic year 22/23 at £32,546. This can be used to cover the cost of specialist equipment, non-medical help and more general costs that the student needs to incur. There is also a separate un-capped travel allowance each year.

We know from student data that more female disabled students access support than male. We also know that DSA recipients tend to be in the 18-44 years age group, with a larger proportion falling into the 18-24 category suggesting those entering higher education for the first time are most likely to access DSA support. As data for ethnicity is optional, we do not have sufficient data to draw any conclusions in relation to those groups most likely to receive DSA or be impacted by the proposed change.

While the overall change will have a significant positive impact on all students going through the DSA application process, we have identified a number of small potential impacts that could be considered negative and will need to be mitigated and/or monitored.

**A reduction in choice of service provider:** The student is currently responsible for choosing their study needs assessment provider from a large supplier base across the UK via a search function held on the .gov website. This 'register' is maintained by DfE for both the SFE and SFW services. Providers on the register have to sign up to minimum standard terms and conditions to be able to offer their services to Government funded students. Under the new arrangements, students receiving support from the SFW service, will be supported by a lead supplier with responsibility for Wales.

The reduction in choice will be mitigated by the new Wales service provider operating Wales-wide, providing full geographical coverage of assessment centres, to ensure study needs assessments can be provided in a location convenient to the student. The student will be contacted by the lead supplier with responsibility for Wales. The student will retain choice about when and where they will attend their assessment, ie close to home, close to their university or a n other location more suitable to them. If in the event the relationship between the assessor and the student breaks down, the lead supplier will assign a different assessor. If a student chooses to have their assessment outside Wales, they can have their needs met by the lead supplier in the new area. SLC will ensure a smooth handover of student information to allow the new supplier to engage directly with the student without duplication of effort. The lead supplier will have mechanisms in place to manage the relationship with the student to ensure they are receiving a quality service. The service requirements and performance indicators have been set by the contract to ensure parity and quality of service. The service performance will be monitored by SLC at weekly, monthly and annual intervals. Any complaint will be overseen by the SLC and Welsh

Government as part of contract performance measures. It is a requirement of the contract that the student's needs come first.

Until the outcome of the procurement is known, and the lead supplier with responsibility for Wales is agreed, the network of underpinning sub-providers and or delivery partners will be unknown. It is acknowledged that the future landscape will be different to the current one and existing assessment providers, including those based within universities, may not be part of the new delivery model. The lead supplier with responsibility for Wales will, however, be expected to work closely with all universities in Wales and their disability services. This will ensure students receive a seamless programme of support from both the DSA service provider and their university disability support services where applicable. Feedback from student in relation to receipt of their study needs assessment will be regularly monitored and reported to Welsh Government.

**Loss of service provider:** It is acknowledged that the future landscape of DSA service provision for study needs assessments, assistive technology and assistive technology training will look significantly different post contract. There is a risk that, existing suppliers who do not feature in the new model of delivery, withdraw from the market leaving students currently receiving support at a disadvantage. To mitigate this, SLC will be monitoring the performance of existing suppliers post contract award to ensure they fulfil their commitments to students to whom they currently provide support. In the event that a supplier becomes unviable or chooses to leave the DSA market before a student has received their full programme of support, SLC will transfer the student to an appropriate contracted supplier. Welsh Government will be notified of any instance where this happens to ensure minimal disruption.

**Perceived reduced selection of non-medical helper support:** The provision of non-medical help (NMH) is not affected by this process change. The new lead supplier with responsibility for Wales will have to follow existing processes and present the SLC with 2 quotes for NMH where appropriate. Assessors can continue to select from the NMH register published on the .gov website or, if the student has an existing relationship that they wish to maintain, and which is suitable in accordance with the NMH guidance, consideration will be given to retaining support. Concerns have been raised that reducing the number of needs assessment centres that can select NMH providers will by default reduce those NMH providers being selected due to familiarity or repeat business. This will be mitigated through clear guidance provided to the new supplier and through provision monitoring. Should NMH providers choose to exit the market, SLC will ensure students are not disadvantaged and that their support is continued with an alternative provider where necessary. We accept that there may be some disruption for the student should their NMH provider want to stop providing support, it is anticipated that these will be a minority of cases.

**Warranty & Insurance for DSA purchased equipment:** Currently students who are recommended specialist equipment are also provided with a warranty and insurance for the

item. The cost of the item, warranty and insurance is met by their DSA. If the item has a fault, the student is responsible for contacting the insurance provider and arranging for a fix or a replacement item, including a loan item if necessary. Under the new arrangements, if a student experiences a problem with the item(s) they contact the new supplier with responsibility for Wales who will take responsibility of resolving any issues, including sourcing a loan item for temporary use where appropriate. SLC will arrange for the cost of the repairs etc to be met by the students DSA where appropriate. Where a student has opted to upgrade their equipment, and they have chosen not to take out their own insurance, SLC will arrange for a proportion of that cost to be met by the students DSA where appropriate.

Depending on the scale of the fix being paid for, one negative impact may be that students will pay more for a repairs or replacement items than if they had paid for warranty and insurance up front as per the current arrangement. However, the benefits of making this change mean that the vast majority of students will have lower equipment costs up front. Data from SLC shows only a very small proportion of students need to use their warranty and insurance and by moving to a model where payment is made upon need, it enables students to retain more of their DSA for support costs.

SLC will be monitoring the rate of claim in relation to faults and fixes required by students to ensure the change is achieving value for money for the student and public funds. While it is highly unlikely that a student will reach their maximum financial allowance for DSA support, where this does occur, SLC will consider how best to ensure that the student has the equipment they need to remain in study through discussion with Welsh Government. All items will, by default, have a manufacturer's warranty. Placing responsibility on the supplier with responsibility for Wales and SLC to arrange for a repair or replacement for the student further relieves the administrative burden on the student.

***What if any, barriers do people who share protected characteristics face? Can these barriers be reduced, removed, mitigated?***

The contracted service is designed to remove the administration barrier placed upon the student after they have been deemed eligible for DSA support. From research carried out by the SLC, students with disabilities find the DSA process very complex and lengthy. Students with mental health conditions have reported they struggle to navigate through the multiple levels of the process where they have to source and make appointments for assessments and support directly with the suppliers themselves. For the average level of support (assessment, equipment and assistive technology training to use the equipment), there could be at least three different companies to engage with. This often exasperates conditions leading to students dropping out of the DSA process and never receiving the support they are entitled to. Data from SLC suggests that up to 30% of students deemed

eligible for support, do not progress on to receive support<sup>1</sup>. The frustrations are not limited to those with mental health conditions. Students with a wide range of disabilities have reported problems with the current process. Delays in arranging support can often mean that support is not in place for the start of the student's course, or until they are well into their course.

The new arrangements will remove the administrative burden placed on the student following their confirmation of their eligibility. The new supplier with responsibility for Wales will contact the student and arrange the study needs assessment and co-ordinate any equipment and training support awarded after the assessment. There will be no requirement on the student to contact multiple suppliers to arrange this support. They will of course have reached an agreement with the contacted supplier about the time and duration of support before the service provider engages with suppliers on the student's behalf, and the student will be informed throughout the process to provide confirmations and assurances.

The design of the new process is also seeking to introduce data sharing principles between SLC and the contracted providers. Currently, a student will have to share any information they have provided to the SLC about their disability with the study needs assessor separately. This is duplication of effort and can cause unnecessary burden, and sometimes cost, for the student. The new arrangements will see SLC share directly with the lead supplier ensuring they have the information they need to conduct a full assessment without the student having to provide anything separate. The student will be providing evidence once at the start of a seamless support service.

Barriers we are seeking to remove with this change include exasperating existing conditions of stress and anxiety, or indeed creating new ones. Student research has demonstrated that students have varying levels of communication and organisational ability and some lack the confidence to engage with others, particularly where there are multiple organisations to engage with at the same, or different times, and with different people each time. Delays in the process create additional barriers for students and it may mean they do not receive their support in time for the start of their course or they fail to secure specific items of support at all; this directly impacts on their ability to participate in study. While the onus will still be on the student to attend a study needs assessment and to take up any assistive technology training recommended, the barriers identified with the administrative requirements of arranging for the appointments and delivery etc of support, will all be removed through this process change. The lead supplier will also maintain a relationship

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<sup>1</sup> Data referred to in the Our Needs procurement document stating 57,546 applications for DSA in 20/21 compared with circa 40,000 students that receive support. The difference in the two figures include those who choose not to start their course and those who receive sufficient support from the HEP to not pursue DSA.

with the student throughout their DSA journey to ensure the student is actively engaging with the support awarded and that their support needs remain current. The student will have one point of contact if they experience any issues or problems.

***How will you know if your piece of work is a success?***

Planning around the performance measures of the contract demonstrate that the customer journey can be significantly reduced. Successful implementation of contracted provision will not only result in the reduction in the duration of the DSA customer journey but also a reduction in the number of students dropping out of the process post eligibility award.

Regular student surveys will be undertaken to monitor the satisfaction rates of students going through the process. Contracted suppliers will also have key performance indicators to maintain a quality service to students approved for DSA are actually receiving their study needs assessment within the agreed timeframe and reducing the rate of drop out between application and assessment.

While not an immediate outcome that this contract will monitor, an increase in the take up of DSA support can only lead to better outcomes for disabled students accessing and completing higher education.

**Record of Impacts by protected characteristic:**

<b>Protected characteristic or group</b>	<b>What are the positive or negative impacts of the proposal?</b>	<b>Reasons for your decision (including evidence)</b>	<b>How will you mitigate Impacts?</b>
Age (think about different age groups)	Overall, no impact although the data suggests that more 18–24-year-olds are in receipt of DSA than those aged 25+ and so by default, 18-24 years olds will be more	There is no age restriction on students applying for DSA, all eligible students undertaking a designated course can apply for DSA support. The age of those in receipt of DSA is	N/A

	affected by the change to the DSA process.	indicative of the age of those more generally attending university.	
Disability (consider the social model of disability and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)	Positive impact	The change will significantly improve the process for disabled students securing DSA support. The process will be quicker and there will be much less administrative burden placed on them as a result of the change. Contacted providers must provide any reasonable adjustments the student needs to facilitate the process and provide ongoing support during their studies where required.	N/A
Gender Reassignment (the act of transitioning and Transgender people)	No impact	Students will be supported through the DSA process as the gender they identify with	N/A
Pregnancy and maternity	No impact	The level of service received will be the same as all other students.	N/A



<p>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</p>	<p>No impact</p>	<p>The level of service received will be the same as all other students. The service will only be available to eligible students and as such, all evidentiary checks for eligibility and residency will have already been concluded. Race is an optional field that is not connected to the application for student support or DSA support.</p> <p>The SFW processing team are developing new guidance in relation to students with a nomadic lifestyle to ensure they are not disproportionately affected by any request for evidence of disability or residency.</p> <p>Furthermore, the design of the contracted provision will include an offer where the assessor can offer discretion in relation to the location of the assessment to ensure the student's needs are met.</p>	<p>N/A</p>
<p>Religion, belief and non-belief</p>	<p>No impact</p>	<p>DSA is a grant not a loan that generates interest and as such, can be</p>	<p>N/A</p>

		accessed by any eligible student.	
Sex / Gender	No impact	The data suggests more females are in receipt of DSA than males. By default females will be more affected by the process change females access DSA support than males.	N/A
Sexual orientation (Lesbian, Gay and Bisexual)	No impact	This level of data is not collected by the application process.  All students will be treated respectfully and without prejudice or discrimination	N/A
Marriage and civil partnership	No impact	All eligible students will receive the same standard of service	N/A
Children and young people up to the age of 18	N/A	DSA is available to students accessing HE support – generally all over 18 although, as DSA support can be put in place before the start of the academic year, some students (depending on their birth date) may be accessing support at the age of 17	N/A
Low-income households	No impact	DSA is not means tested, support is dependent on the student's individual	N/A

		study related needs and not their household income	
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