

**Randstad Student Support - DSA Guidance Analysis**

Section	Clause No.	Page No.	Wording	Comment or Potential Impact
General Guidance	1.1	6	For the purpose of this document the term 'institution' covers any institution which provides higher education (HE) courses which are designated for HE student support purposes, including further education colleges providing HE and alternative providers, unless otherwise indicated.  Institutions have the primary legal duty to support disabled students in their studies in higher education, set out in the Equality Act 2010.....and funding through DSAs should be the top of an apex of support, underpinned by an inclusive environment, and institutional reasonable adjustments where full inclusivity is not possible.	This is being used to position the overall change of responsibility to HEI's under the Equality Duty. Financial and legal liability for HEI's, both in terms of making HEI's arrange/pay for all adjustments as well as be liable if they are not seen as being reasonable.
General Guidance	1.3	7	This guidance does not set out what an institution should do to meet that legal duty. The decision on how to satisfy that duty is for the institution to determine and advice is available from other sources, for example the Equality Challenge HEIt <a href="http://www.ecu.ac.uk/publications/managing-reasonable-adjustments-in-higher-education/">http://www.ecu.ac.uk/publications/managing-reasonable-adjustments-in-higher-education/</a> . However, this guidance does indicate where increased responsibility for reasonable adjustments is expected to fall on institutions.	As above. Also distancing BIS from the decision making process or setting the acceptable standards for HEI's.
General Guidance	1.4	7 & 8	This guidance sets out the type of support that may be funded for students through DSAs. This is based on an expectation that institutions will be fulfilling their duty to provide reasonable adjustments in a number of areas. From 2016/17 institutions will be expected to make reasonable adjustments for a range of non-medical help and that will be set out more fully in guidance for 2016/17.	This shifts the burden for funding and providing a range of NMH roles to the HEI's. HEI's may not have the like for like funding to replace NMH and may also need to look at alternatives to DSA such as internal budgets, accessibility of learning and equipment.
General Guidance	1.4	8	For 2015/16 funding through DSAs will continue to be available across the range of non-medical help, but that does not remove the expectation that institutions will start to take responsibility in this area where they can ahead of 2016/17.	What do BIS mean by this? What will they expect HEI's to do ahead of 2016/17 and how will this be judged/measured/administered?
General Guidance	1.4	8	In many cases funding through DSAs may be available, but the support is already available through the institution through a reasonable adjustment. In such cases funding through DSAs should not be recommended, as the support provided by the institution already meets the need of the student.	How will assessors know this and how will this be consistently controlled?
General Guidance	1.4	8	Institutions should consider how they can best support this process, for example by publishing the support available to their general student body, and disabled students in particular, on their websites.	HEI's will need to do a lot of work to communicate and keep this updated.
General Guidance	1.4	9	The DSA assessor should also be aware of the requirement for local authorities to provide them with current assessment information for young people with special educational needs who have been supported through an Education, Health and Care plan while at school and/or college, where requested by the student .	For information only.
Access Agreements	1.7	10	The Secretary of State and the Minister for universities issued guidance to the Director of Fair Access in February 2011. The guidance made clear that under-represented groups across higher education include students with disabilities. It specifically said that we would like institutions to consider these and other under-represented groups within their overall approach to access, and that we would like the Director to take account of their efforts in considering access agreements.	For information only.
Access Agreements	1.7	10	Those institutions with access agreements agreed with the Office for Fair Access estimate they will spend £713m on measures to support access and student success for disadvantaged students (including disabled students) through their access agreements in 2014/15, up from £444m in 2011/12.	What will be available to the disability team from this?
Role of HEFCE	1.8	11	The Higher Education Funding Council for England (HEFCE) allocates a Disability Premium to publicly-funded institutions in England (£15m in 2014/15), through the student Opportunity fund.	What will be available to the disability team from this?
Student Opportunity Fund	1.8.1	12	The student Opportunity fund is part of the overall Teaching Grant allocated to Higher Education Institutions by HEFCE and it is their responsibility to take decisions on how their budgets are allocated. For 2014/15 HEFCE allocated a total of £366 million through their student Opportunity fund for widening access, student retention and success, and to support disabled students.	What will be available to the disability team from this?
Student Opportunity Fund	1.8.1	12	Whilst no ring-fenced funding is provided to institutions to support disabled students, institutions should consider carefully how it will support its disabled students, including those on low incomes who may require individual access to personal computer equipment.	For information only.
Role of Disability Services	1.10	13	If requested to assist a student with their DSAs needs assessment it is essential that the disability adviser does not advise the student to purchase equipment or services on the assumption that funding through DSAs will be made available.	For information only.
Role of Disability Services	1.10	13	Disability advisers have an understanding of the institutional environment and will have access to academic teaching staff and to detailed course information. They can therefore provide useful information to DSA study needs assessors when there is uncertainty about what recommendations might best support the student in the particular context.	How will this information be recorded/shared/passed to Assessors. May lead to confusion, delays and inconsistencies.
Role of Disability Services	1.10	13	Disability advisers will also have an up-to-date knowledge of the level and type of support offered by their institution as reasonable adjustments under the Equality Act, or more generally as part of the institution's support for disabled students or students in general. Institutions should also be working towards making this information more readily accessible for students and Assessment centres.	As above.
Role of Disability Services	1.10	13	It is the view of the Department that it is not appropriate for a disability adviser to carry out the DSA needs assessment of students for whom they are responsible.	

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Role of DSA Needs Assessors	1.11	14	If DSAs are available, but the Assessor determines that some of the support is already provided by the institution, then DSAs funding will not be necessary and should not be recommended for that support.	How will DSA assessors know this info and will it lead to inconsistencies or incorrect expectations from students.
Role of DSA Needs Assessors	1.11	14	The primary responsibility for supporting a disabled student is the institution and DSAs are made available to complement that support. DSAs study needs assessors should set out clearly in the report what recommendations they are making for DSA funded support.	As above.
Role of DSA Needs Assessors	1.11	14	Any recommendations for DSAs support will continue to require full justification. Decisions on the support to award will be taken by Student Finance England, taking into account the recommendations of the DSAs study needs assessor	This could lead to more students being turned down for DSA and put additional pressure on HEI's, if SFE feel the HEI could/should be providing certain reasonable adjustments..
Role of DSA Needs Assessors	1.11	14	If the DSA study needs assessor identifies support that falls outside DSAs funding, they will wish to advise the institution of their findings for consideration under reasonable adjustments.	How will DSA assessors do this? What will the comms look like between Assessors and HEI's?
Role of DSA Needs Assessors	1.11	14	The DSAs study needs assessor should not state how that support should be delivered or the level required – that is for the institution to determine taking into account the individual needs of the student.  The advisory note in the report should simply state: 'The study needs assessment has identified some areas where the student may require support, but the support falls outside the scope of DSAs. It is therefore suggested that the university and its academic, administrative and support departments note the following areas where the student may require additional support and consider what reasonable adjustments can be put in place to meet the identified need... '	This will leave it open as to what's reasonable and may lead to inconsistencies and more work for HEI's. It may also not set clear expectations for students and HEI's in the way that the current DSA system does.
Role of SFE	1.12	15	SFE are required to make decisions on DSA awards, taking into account the recommendations of the DSA study needs assessor. SFE will challenge study needs assessment reports where DSA support is recommended that falls outside this guidance and a reasonable adjustment is either expected or is known to be offered.	How will SFE decide this? Where will they get their information on what HEI's can offer? This will also leave it open to SFE's interpretation of what's reasonable. It also will lead to inconsistencies and more work for HEI's.
Role of SFE	1.12	15	Where a student or institution approaches SFE to seek additional DSA funding in the absence of reasonable adjustments, the case may be brought to the attention of BIS to determine what action might be taken in relation to the institution's response, for example DSAs support might be put in place through the Exceptional Case Process, whilst discussions are underway with the institution.	This is one angle for HEI's to take to get students recommendations reviewed, but won't be the norm.
Role of DSA-QAG	1.13	15	DSA-QAG is a non-profit making company with charitable status. Its board is made up of representatives from institutions, DSAs study needs assessors, DSAs equipment suppliers and the NUS, with observers from BIS and the SLC.	For information only.
Role of DSA-QAG	1.13	15	DSA-QAG has responsibility for a quality assurance framework against which levels of service for both DSA assessment centres and equipment suppliers are audited. From 2015/16, only DSA-QAG registered or accredited assessment centres and assistive technology service providers can provide DSA-funded study needs assessments or assistive technology services.	This may impact any HEI's who run or use assessors who are not currently DSA/QAG registered.
Role of DSA-QAG	1.13	15	Non-medical help services are not included in the DSA-QAG registration scheme for 2015/16.	Does this leave the door open for them to be included in the future? If so, it will put additional pressure on HEI's/providers to take part in audit requirements. Will this have cost implications?
Role of DSA-QAG	1.13	15	From 2015/16 DSA study needs assessment centres and assistive technology service providers are required to be registered with DSA-QAG in order to deliver DSA services.	For information only.
Transitional Arrangements	1.14	16	The changes set out in this guidance apply to:  (i) Students who are starting a higher education course for the first time in 2015/16 and are applying for DSAs for the first time; (ii) Students who are starting a higher education course in 2015/16 and are applying for DSAs, having studied on a previous course where they did not apply for DSAs; (iii) Students who are starting a higher education course in 2015/16 and are applying for DSAs, having ceased to undertake a previous HE course where they were awarded DSAs more than 5 months before the start of the current course (i.e. the gap between the two courses is more than an intervening vacation); or (iv) Students who are continuing a higher education course in 2015/16 and who are applying for DSAs for the first time.	For information only.

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Transitional Arrangements	1.14	16	<p>Transitional arrangements are in place for the following students, who will continue to be assessed under the Student Support Regulations 2011, as amended and the DSA guidance 2014/15.</p> <p>(i) Students who are continuing a higher education course in 2015/16, having been awarded DSAs for a previous year/years of their course;</p> <p>(ii) Students who are transferring to a higher education course in 2015/16 from a previous course which started before 2015/16, where the student was awarded DSA for the previous course;</p> <p>(iii) Students who are starting a higher education course in 2015/16 immediately after (excluding an intervening vacation – maximum 5 months) completing a previous higher education course, where the student was awarded DSAs for the previous course; or</p> <p>(iv) Students who started a higher education course before 2015/16, who suspended their studies with the agreement of their HEI and notified Student Finance England and are returning to their course in 2015/16, where the student was awarded DSAs for a year/years of the course before 2015/16. The period of suspension is normally up to 1 academic year in length but could be up to two years in exceptional circumstances.</p>	<p>What are the transitional arrangements? When will they be firmed up? This will impact on students that are currently in receipt of DSA. Needs to be made clear if they will continue to access DSA in the current format beyond 2015/16.</p>
The Equality Act	2.1	17	<p>Under the Equality Act 2010 institutions have a duty to make reasonable adjustments for disabled people to ensure they are not placed at a substantial disadvantage compared to non-disabled students.</p>	For information only.
The Equality Act	2.1	17	<p>The duty to make reasonable adjustments comprises three requirements. For higher education providers, these requirements are:</p> <ul style="list-style-type: none"> <li>• Where a provision, criterion or practice puts disabled students at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.</li> <li>• Where a physical feature puts disabled students at a substantial disadvantage compared with people who are not disabled, to take reasonable steps to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.</li> <li>• Where not providing an auxiliary aid or service puts disabled students at a substantial disadvantage compared with students who are not disabled, to take reasonable steps to provide that auxiliary aid/service.</li> </ul>	For information only.
The Equality Act	2.1	17	<p>The duty to make adjustments arises where a provision, criterion or practice, any physical feature of the education provision or the absence of an auxiliary aid or service puts disabled students at a substantial disadvantage compared with students who are not disabled.</p> <p>The Act leaves open what particular auxiliary aids or services might be provided in specific circumstances. The duty remains with the education provider to determine what steps it would be reasonable for them to take.</p>	For information only.
Anticipatory Reasonable Adjustments	2.3	18	<p>There is an anticipatory duty to provide reasonable adjustments for disabled students, which means service providers must plan ahead and take a strategic approach to addressing the barriers that potentially impede individuals with different kinds of disability.</p> <p>This will involve institutions putting in place systems that are fully inclusive or can be utilised as appropriate by disabled students, staff and/or visitors. Alongside this, disabled students are entitled to individual reasonable adjustments for specific requirements.</p>	<p>This is quite a broad statement and will be fundamental in shaping where SFE may draw the line on what is reasonable for a HEI to provide and therefore, what is not covered by DSA.</p>
Anticipatory Reasonable Adjustments	2.3	18	<p>It is not always possible to anticipate the needs of disabled students. Disability is an individual experience, with both the nature and the impact of the disability varying from individual to individual.</p> <p>However, some disabilities are more common in the student body than others. Our evidence shows that the prevalence of Specific Learning Difficulties (SpLDs) in the UK domiciled student population has been fairly constant over the last decade and is estimated to be higher than in the general population.</p>	<p>Depending on where SFE/BIS draw the line on this, will dictate how many students will and won't qualify for DSA in Bands 3&amp;4. Further clarity is needed here as this has the potential for a large proportion of the current student body to be removed from DSA.</p>
Anticipatory Reasonable Adjustments	2.3	19	<p>Students with SpLDs constitute just under half of the higher education population that declare a disability, the largest disability group that institution provision needs to accommodate. Within this group the most common learning difficulty is dyslexia. This suggests that all institutions will have a number of dyslexic students who may require adjustments, which could include making changes to course materials and course delivery.</p> <p>We would expect institutions to particularly consider what anticipatory adjustments should be made to accommodate this significant proportion of disabled students. However, we recognise that for some students these adjustments will not be sufficient, and for these DSAs support will need to be accessed.</p>	As above.

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Individual Reasonable Adjustments	2.4	19	In the past, the provision of individual DSAs may have removed the need for reasonable adjustments in some cases. However, DSAs funding will no longer be available to students where a reasonable adjustment is expected to be made. It is not the role of government to set out for institutions what constitutes a reasonable adjustment.  However, this guidance will set out where DSAs funding will no longer be available and reasonable adjustments are expected, to ensure the two systems complement each other effectively.	Re-enforces the shift in responsibility to HEI's.
Individual Reasonable Adjustments	2.4	19	Institutions should not take the continued provision of DSAs as setting the limit to their reasonable adjustments. We expect institutions to strive to provide the best possible support for all their students, including their body of disabled students, to continue to remove or reduce the need for individual support through DSAs.	Set's out future pressure on HEI's to do more.
Examples of Reasonable Adjustments	2.5	19	Over time we hope to provide case studies of good practice in institutions, which those involved in strategic planning within institutions may wish to have regard to. Each institution will have its own response to how to best support its body of disabled students and case studies will be offered as examples, not a statement of what each institution should be doing in a particular area.  Stakeholders working within the sector have produced examples of what inclusive provision might look like and some of these are extracted at Annex B for illustrative purposes.	For information only. Also, the ideas put forwards in Annex B may well set the benchmark/expectations for students of what their HEI should be providing.
Work Placements	2.6	19 & 20	Work placements are included in the Equality Act 2010 which means that college and university staff must also take into account a person's disability when arranging work placements and liaise with the work placement providers to implement the support.	For information only.
Technical Guidance - Eligibility	3.1	21	Details the general eligibility criteria - refer to the guidance directly.	For information only.
Technical Guidance - Social Care	3.1	22	Social Services may continue to provide assistance towards personal care costs that would be incurred in the UK, regardless of whether or not a student is attending a course. Support needs can be reassessed by Social Services when there is a change in a person's personal circumstances, such as leaving home to attend a course or a change in health. In the event of a student moving away from their home area to attend a course, funding responsibilities for personal care would continue to rest with the Social Services Department in the student's home area.	For information only.
Technical Guidance - Definition of Disability	3.1.1	22	For DSAs, the Equality Act 2010 definition of disability is used to determine eligibility. Students falling within the Equality Act 2010 definition of disability are eligible to apply for support through DSAs.  The Act defines a disabled person as a person with a disability. A person has a disability for the purposes of the Act if he or she has a physical or mental impairment and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.  Sometimes a student's disability does not substantially affect their normal day to day activities but does have a substantial effect on their ability to study. In the context of DSAs 'day-to-day activities' includes education.	For information only.
Technical Guidance - Evidence of a Disability	3.1.2	23	A student wishing to apply for DSAs is required to submit medical/diagnostic evidence in order for eligibility to DSA to be determined. Medical evidence can be in the form of a diagnostic assessment (for students with a SpLD), or evidence from a GP or consultant, or other qualified medical practitioner or appropriate specialist.  Medical evidence should state the nature of the student's disability and ideally should also briefly explain how the student's disability impacts upon them. SFE will seek further information from the student/medical practitioner if it is not clear that the student meets the definition of disabled. Evidence included in an EHC plan can support the diagnosis, particularly in signalling areas where the student needs support.	Will be interesting to see how this is enforced and how many students are excluded on the grounds of insufficient evidence.
Technical Guidance - Evidence of a Disability	3.1.2	23	Students with a specific learning difficulty such as dyslexia will need to provide evidence of this by submitting a diagnostic assessment from a practitioner psychologist or suitably qualified specialist teacher (see Annex A for more information on diagnosing and assessing students with SpLD). <b>The diagnostic assessment must have been carried out after the student's 16th birthday to be valid for DSA purposes.</b>	How many student's will have a diagnostic done after their 16th birthday? If not, then it will rule out or delay support for these students whilst they go through the process and cost of getting this done.
Technical Guidance - Evidence of a Disability	3.1.2	23	Cases may arise where the evidence that the student has a disability is deemed insufficient. In such cases, the student should be invited to provide further evidence, perhaps in the form of a diagnosis undertaken by a professional body or another acceptable person or their EHC Plan. In making such an invitation, it must be made clear to the student that they will normally be liable to meet the cost of providing the necessary evidence. This cost cannot be met through DSAs, however some institutions may consider providing help with the costs of diagnostic assessments e.g. for dyslexia.	For information only.

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Technical Guidance - Evidence of a Disability	3.1.2	23 & 24	Once satisfactory evidence is received, the student will be notified to book a DSA needs assessment to identify the appropriate course-related support. The cost of the assessment is met from the general allowance of the DSA.  Any cost a student incurs obtaining the necessary expert evidence or opinion cannot be met from the DSAs. This is because such costs are not incurred by the student to attend or undertake their course; they are incurred to substantiate their claim for DSAs.	This may impact the HEI as they may need to help the student fund this.
Technical Guidance - Students studying in Scotland, Wales & NI.	3.1.4	24	Some English students who intend to study in Scotland, Wales or Northern Ireland may attend a DSAs needs assessment in their home area before they start their course. This should be carried out by a DSA-QAG registered or accredited assessment centre.  However, there will be some occasions when students who are domiciled in England but study in Scotland, Wales or Northern Ireland require a needs assessment during term time. In these circumstances, SFE may accept needs assessments carried out by centres used by the Students Awards Agency for Scotland (SAAS) and the Department for Employment and Learning (Northern Ireland). Students studying in Wales are covered by the DSA-QAG administered list of assessment centres.	For information only.
Technical Guidance - Prisoners	3.1.5	24	Full-time students who are prisoners and who began a designated course before 1st September 2012 are potentially eligible for DSAs but will not generally qualify for other grants for living and other costs.  No Disabled Students' Allowances (DSAs) (including DSAs for postgraduate courses) will be available to any prisoner who starts a course on or after 1 September 2012. The responsibility to provide assistance for disabled prisoners will lie with the Prison Service.	For information only.
DSA for Students in Final Stages of Course	3.1.8	25	'DSAs funding can be considered for support needs from the date of the application onwards, irrespective of the time left on the course' however later in the section 'Disability Advisers may be able to arrange institutional support, such as exam support, study support or revision skills, or loan equipment. This support is unlikely to be funded through DSAs'	Will impact on interim support and HEI's ability to claim it back.
DSA Allowances	3.2.4	28	DSA levels quoted as same in 2014/15, but clarification that 'There is no provision to pay more than the maximum allowances set out in the Regulations'. The level for NMH allowance is currently set at £20,725 for a FT UG student, although this seems a generous amount it doesn't cover many of the costs for students with complex needs.	As per current levels.
DSA Allowances	3.2.4	28	Only the general allowance may be used to supplement expenditure on specialist equipment and non-medical helpers should the student's needs exceed the maximum allowances under the Regulations. The specialist equipment allowance, non-medical helper allowance and the travel allowance should be used for the sole purpose as named and should not be used to supplement other DSAs.	For information only.
Non-medical Help	3.2.5	28	The non-medical helper allowance is to provide funding for additional support which the student requires, because of a disability, to undertake their course on an equal basis to other students. Institutional reasonable adjustments should be considered in the first instance, before a recommendation for DSAs funding is made.	Pressure on HEI's to put in their own adjustments ahead of DSA. Where will the lines be drawn and by whom?
Non-medical Help	3.2.5	29	Many universities already employ non-medical helpers on behalf of disabled students or administer a register of non-medical helpers who are self-employed. This involves advertising, recruiting, training, organising and paying the non-medical helpers. Some institutions operate a register of support workers and have formal contracts or agreements with the non-medical helpers. In such arrangements, as well as paying the non-medical helper's wages, DSAs could also pay for the non-medical helpers' tax, national insurance contributions and other employer-related costs.	For information only.
Non-medical Help	3.2.5	29	DSAs NMH services should also be provided by support workers who have the appropriate employed or self-employed status. DSAs funding will not be available for individuals without an appropriate employment status i.e. they must be registered with HMRC to pay tax and national insurance on their earnings.	For information only.
Non-medical Help - Admin Charges	3.2.5	29	In the context of DSAs, many institutions arrange and administer non-medical helper support; and institutions may incur extra costs in providing this service. Such costs might include recruiting potential non-medical helpers, advertising for helpers, selecting suitable candidates, training unqualified non-medical helpers and maintaining records of their personal and financial details. Administration costs form part of the on-costs that are a legitimate part of the overall cost.  However, on-costs must relate solely to the provision of support for that particular student. DSAs cannot be used as a contribution towards the infrastructure, general administration and pastoral costs of the institution. That is, DSAs must not be used to cross-subsidise the infrastructure of institutions' disability services.	HEI's may need to review their pricing policy versus this, dependent on what they have in place currently.

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Non-medical Help - Admin Charges	3.2.5	30	Institutions' governing bodies are responsible for the proper stewardship and value for money of public funds, and the amount institutions claim for DSAs administration needs to be relevant and proportionate, and to have been incurred by the institution specifically in providing the DSAs service to the DSAs recipients in their care.  Fixed percentages without an evidence base do not provide a sound basis for the calculation and award of relevant administration costs. Finding the clearly calculated cost of activity is a more transparent and sustainable means of funding than arbitrary fixed percentages. Costs should be based on actual delivery and not assessed delivery. Institutions may be asked to submit information on how any on-costs in relation to the DSA recipient have been calculated.	As above.
Non-medical Help - Admin Charges	3.2.5	30	Administration charges and associated overheads should be claimed only once: the same activity should not be claimed twice. A reasonable level of actually-incurred marginal costs should be the maximum.  Institutions and providers should clearly distinguish the types of services and their costs on the invoices submitted. All costs must be clearly indicated on the invoice. Additional costs not included in the stated on-costs for providing the service will not be funded through DSAs.  Any provider, institution or private, may be asked to submit details of how their administrative costs have been calculated with the first claims each year. Costs are expected to be maintained at the same level during the academic year for certainty for the student and SFE.	As above - also, not clear how SFE/BIS will roll this out.
Non-medical Help - Admin Charges	3.2.5	30	A fundamental review of costs should be undertaken by institutions / providers periodically to ensure that the service continues to provide value for money (for example, that efficiency improvements are effectively managed, to avoid a "last year plus x per cent" approach, and to assess whether the level of resources used to provide the service remain appropriate in the light of changing demand and other factors) and to avoid double-counting.	HEI's may need to review their pricing policy versus this, dependent on what they have in place currently.
Cancellation Charges	3.2.5	30	As a general rule NMH provision will only be paid for through DSAs if the student has taken up that support. There will of course be occasions where a student fails to attend NMH sessions at short notice for reasons such as illness. In such circumstances a cancellation charge may be met from the student's DSAs, for example, where the terms of a contract the student has entered into with an institution or other provider of NMH support stipulates that a charge will be made for missed sessions if less than 24 hours' notice of cancellation is given.  However, SFE will not pay for NMH provision that is repeatedly not being used, or where students indicate that they no longer need or want NMH support. <b>All missed sessions will be carefully considered by SFE and where more than two sessions have been missed per quarter DSAs funding may be suspended.</b> Further guidance on missed sessions will be provided in due course.	This is in-line with most of our HEI's current policies. BIS are also firming this up further and are taking some advise from stakeholders including the Association of NMH Providers.
Non-medical Help	5	43	The Government has announced that for 2015/16 the full range of NMH support will continue to be funded through DSAs but that institutions are expected to take on more responsibility for providing NMH from 2016/17. The purpose of this guidance is not to set out the detail of what the changes for 2016/17 will be, but to set out the position for 2015. However, the guidance does provide an indication of where institutions may be expected to provide support through reasonable adjustments from 2016/17 in order to enable institutions to start preparatory work in this area. It does not provide detail or exceptions and should be used for indicative purposes only at this stage. Guidance for 2016/17, including additional information on non-medical help in 2016/17 will be published in due course.	This is in line with expectations, but we need to understand what BIS mean about HEI's doing what then can ahead of the changes and how will this be enforced?
Non-medical Help	5	43	'For 2015/16 DSA will continue to fund the range of non-medical help support set out in the SLC non-medical help services reference manual, <b>where reasonable adjustments have not been made</b> '.	We need to be clear about how they will enforce this - i.e. will BIS insist that certain adjustments must be in place?
Non-medical help	5	43	The reference manual is not regulatory and does not set out what DSAs will or will not fund. The reference manual was developed to enable SLC to manage and streamline the invoicing process for students drawing down this support.	How will the manual be enforced? We know the bandings have been pushed back to 2016-17.
Non-medical help	5.2 to 5.33	44 to 48	Outlines all the roles included in Bands 1 & 2 and states that all roles other than 'Sighted Guide' will - <b>'From 2016/17 institutions are expected to be the primary provider of this support'</b> .	As expected from the first announcement in April 14.
Non-medical help	5.3.2	47	DSA funding is available for Examination Support Workers for 2015/16 where reasonable adjustments are not in place. From 2016/17 institutions are expected to be the primary provider of this support.	Will impact on any current exam support that may have DSA to cover it (i.e. scribes)
Non-medical help	5.3.3	48	The typing up of written notes by the note-taker or a third party is not considered to be electronic note-taking and should not be charged as such (see 5.4.2).	Provides clarity on this as it has been a grey area since the rollout of the NMH Services Reference Manual. Although, this does not address the on-going query about how you charge for or provide types notes where they are recommended.
Non-medical help	5.4 to 5.5.5	48 to 51	Outlines all the roles included in Bands 3 & 4 and states that all roles will continue to be funded through DSA, with the exception of 'Specialist Transcription Services' - from 2016/17 institutions are expected to be the primary provider of this support.	HEI's will need to consider how they will provide/fund transcription services to all students that require it.
Non-medical help	5.4.4	49	Mobility Trainer - remain funded by DSA, but should be only recommended for short time limits only.	Will impact on current mobility training support.

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Non-medical help	5.5.5	51	Assistive Technology Training - remain funded by DSA for the initial training (unclear as to what level this is expected) and then HEI expected to provide on-going training completed. Also HEI's are expected to 'consider bulk-buying licences (for on-line training) to enable their disabled student body to access the training free-of-charge'.	For information only.
Assistive Technology	6.1	53	Standard entry level computers will no longer be provided free to the student through DSA & students will be expected to contribute the first £200.00 to any recommended computer. 'It is not anticipated that institutions will assume the responsibility for providing individual computer equipment to students'. However it also states 'Consideration should be given to providing the most commonly used types of assistive software as standard on networked systems.	May impact the number of students who apply for DSA if the £200 puts them off. Also, financial impact if HEI opts to pay for this on behalf of students.
Assistive Technology	6.2	54	The additional cost of Apple Mac computers will no longer be available through DSA and 'institutions must consider how its students, including disabled students, will access the appropriate equipment, when electing to run courses requiring access to an Apple Mac platform, or other non-standard equipment. Institutions should make appropriate provision for access for all students to such IT equipment. Provision might be made in the form of communal facilities or individual access through institution discretionary funding e.g. bursaries or loan arrangements.	Financial implication for HEI's where MAC's are currently being recommended.
Assistive Technology	6.3	54	Where students are recommended low weight computers due to disability related needs only the additional costs (above £200.00) will now be payable by DSA and not the full cost of the computer.	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.4	54	'DSA funding will no longer generally be provided for tablet computer equipment' and it is 'expected that an entry level computer will provide the same functionality'.	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.5	55	'DSAs funding will no longer be provided for scanners as a matter of course'	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.6	55	'DSAs funding will no longer be provided for printers as a matter of course'. 'Students who require printed documents should contact the institution's library services in order to have access to the institution's printing and scanning facilities'	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.7	55	'DSAs funding is not available for the purchase of standard keyboards, standard size monitors (up to 15") and mice as a matter of course, unless they form part of a recommendation for a desktop computer'	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.8	56	'The standard monitor size is set at 15" for laptops and 19" for desktop computers' and any recommendation above this by assessors must be fully evidenced	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.10	56	'DSAs funding is not available for USB hubs, laptop carry cases, power leads, surge protectors, computer stands/risers' with no exceptions	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.11	56	Digital Voice Recorders will only be covered by DSA funding if 'lecture capture facilities' are not available or the student cannot record lectures or seminars 'via a laptop or a smart phone'	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.12	57	Handheld electronic spellchecker devices will only be considered in exceptional cases	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.13	57	Course specific software will no longer be available even in exceptional cases or for disability related need.	Financial implication for HEI's where these are currently being recommended.
Assistive Technology	6.15	57	Wheelchairs / Mobility scooters will no longer be considered in exceptional cases	Financial implication for HEI's where these are currently being recommended.
Travel	7.2	60	Travel allowance will still be payable to eligible students for travel at the start and end of the day (less standard public transport costs). However if a student needs to travel during the day as part of a work placement, for example off-site meetings, this will be considered a reasonable adjustments by the institution / employer and not refundable from DSA.	Financial implication for HEI's where these are currently being recommended.
DSA Needs Assessment	8.1	61	Changes to any support recommended by the original assessment centre will no longer be able to be made by Disability Advisers and must be made by the assessor. This may create delays for complex students.	Change to current process and takes the business case out of the hands of the HEI and in to an assessors hands. Could lead to less students getting what the HEI thinks they should have and also may lead to inconsistencies and delays.
Internet Connections	8.5	64	Internet connection / costs are no longer refundable from DSA	Financial implication for HEI's where these are currently being provided by DSA.
Interim Support	9.2	65	Reimbursement for NMH provided by an institution may be considered, but it is expected that a reasonable adjustment in such cases may be more appropriate. In any event, only support that is subsequently recommended by the study needs assessor will be funded through DSAs.	May make interim support harder to claim depending on what is included in the award.
Procurement	9.3	65	The current process of exemption from the two quote process is under review. SFE to contact institutions on NMH procurement for DSAs funded NMH for 2014/15 and 2015/16.	Need further clarity on this.
Appeals	9.4	65	Disabled students have legal protection under the Equality Act 2010 from discrimination in the workplace and in wider society. Read this section for further details.	For information only.
Arbitration	9.6	68	Disputes between institutions and SFE on the provision of reasonable adjustments vs DSAs to be confirmed.	Need to monitor this situation as could have impact in situations of conflict.
Devolved Administrations	9.7	68	Students from England studying at institutions in the devolved administrations and who are eligible for student support from SFE will have the same DSAs entitlement as students studying in England.	Relevant for any non-English HEI's.

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Section	Clause No.	Page No.	Wording	Comment or Potential Impact
Specific Learning Difficulties (SpLD)	Annex A	69 to 72	Section to outline in more detail the guidance as to what SpLD's are as viewed by the guidance, the characteristics and diagnostic assessments.	Relevant as to where the line is drawn on complexity of the SpLD and will and won't qualify for DSA.
Examples of Reasonable Adjustments	Annex B	73 to 76	Outlines a range of things that BIS would view as potential reasonable adjustments that HEI's may make. Below are a selection of examples of NMH related adjustments:	Recommend that you read Annex B further to see the types of adjustments that are being recommended/highlighted by BIS in the guidance.
Examples of Reasonable Adjustments	Annex B	73	Examples of reasonable adjustments provided by institutions for hand-outs include they should be available in advance and online, they should be available on non-glare cream/ivory paper. Hand-outs with reading lists to include the library class/ shelf number.	Potential implementation, resource and cost issues.
Examples of Reasonable Adjustments	Annex B	74	Examples of reasonable adjustments provided by institutions for research include that provision of named contacts for disabled students in the library.	Potential implementation, resource and cost issues.
Examples of Reasonable Adjustments	Annex B	74	Examples of reasonable adjustments provided by institutions for study skills include that provision of named contacts for disabled students in each academic department.	Potential implementation, resource and cost issues.
Examples of Reasonable Adjustments	Annex B	74	Examples of reasonable adjustments provided by institutions for Specialist one-to-one support for students with SpLDs to be available from the institution for one hour per week, per SpLD student.	Potential implementation, resource and cost issues.
DSA Assessment of Need Report	Annex C	77 to 78	Outlines the expected layout of the Assessment of Need Report.	For information only.