Independent Review of Financial Support for Students in Scotland
August 2017
Response

About the National Deaf Children's Society

The National Deaf Children's Society is the leading charity dedicated to creating a world without barriers for deaf children and young people. We want to work with Government, local authorities, health bodies, as well as our third sector partners to ensure they can effectively support deaf children and their families.

In Scotland we offer a range of services to help ensure deaf children and young people get the support they need. These services include a national child and family support service, a Freephone Helpline, a range of events for parents and young people, access to a technology loan service and support from nine local deaf children societies across Scotland.

We welcome the opportunity to feed in to the independent review of student support from our perspective as an organisation which supports deaf children, young people and their families up until the age of 25 years. Please note we use the term 'deaf' to refer to all levels and types of deafness from mild to profound.

Context

There are as many as 3850 deaf children in Scotland;
-   90% of deaf children have hearing parents with no previous knowledge of deafness;
-   Deafness is not a learning disability, but deaf learners consistently do worse than their hearing peers at school;
-   Deaf children have poorer life chances: fewer go on to university and deaf adults experience higher than average unemployment;
-   Teachers of the Deaf are a lifeline for many deaf children but these services are being squeezed and half are due to retire within the next 10 to 15 years.

D. Consultation questions
The key findings support consideration of the changes presented below. Views are invited on these, as well as responses to the underlying questions:

1 – Greater alignment of financial support for students across colleges and universities with increased fairness in what all students can access;
Rationale: to create parity for all students whatever the level of study

•   Deafness is not a learning disability and with the right support, there is no reason why deaf young people should be achieving any less than their hearing peers. However Scottish Government data shows that there is a wide attainment gap for hearing impaired school leavers, and the attainment of this group is among the lowest of all pupils in Scotland. This was explored last year by the Education and Culture Committee during their Inquiry into the attainment of pupils with a sensory impairment.

- According to the latest Scottish Government attainment data 10.3% of deaf school leavers left with no school qualifications, compared with 2.5% of all pupils. With 44.2% of deaf learners obtaining Highers or Advanced Highers, compared with 69.1% of all pupils. This gap in achievement at school goes on to affect deaf young people's life chances, with 36.1% going onto higher education compared with 45.9% of those with no additional support needs (ASN).

Further Education

- The latest data shows a reduction in deaf school leavers accessing further education (FE) compared with previous years, with numbers down from 46.1% to 37.4% from last year's cohort. As college is traditionally a popular post-school destination for deaf school leavers, this reduction in access is of concern. The number of deaf school leavers obtaining National 4 and National 5s as their highest qualification reduced by 4.8% compared with the previous years cohort.

- In addition, research has found **support for deaf students in FE across Scotland is inconsistent**, with some colleges having good support in place and others not providing adequate support. In some instances students have complained about insufficient numbers of Electronic Note Takers and Communication Support Workers.[1] There is also a need to improve the numbers of deaf students articulating from FE to HE and ensuring more Scottish Universities welcome access at HND level.[2]

Higher Education

- Upon leaving university, research has shown that deaf young people have good graduate outcomes once they finished a degree, at a similar level to the general population.[3] Deaf school leavers entering HE in 2015/16 increased by 9% compared with the previous year. However, the research has also suggested that it is traditionally a more socio-economically privileged group of deaf young people who enter HE and this could play an important role in their positive outcomes. **More work is required to improve access to HE for deaf school leavers. As discussed later in this response, we would propose more access courses and summer schools to prepare deaf students.**

1.1 Should there be parity in funding levels available to all students, based more on need rather than the level of study?

- We have concerns around the consistency of support in college settings and how deaf young people are succeeding in their transition out of college into sustainable employment. Interviews with 30 deaf young people aged 18 to 24 years old in 2013

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[1] Fordyce et al 2013, http://www.docs.hss.ed.ac.uk/education/creid/Reports/30iii_NDCS_PostSchTransit_FinalRpt.pdf
[2] O'Neill et al 2014, http://www.blendedlearning.me/DASS/site/reports/EDU%2037468%20-%20Nuffield%20Report%20MASTER%20v3.pdf

[3] Fordyce et al 2013
http://www.docs.hss.ed.ac.uk/education/creid/Reports/30iii_NDCS_PostSchTransit_FinalRpt.pdf

revealed that support was inconsistent at college and a number had dropped out of their courses due to this (University of Edinburgh, 2013). Funding levels should reflect that deaf learners must get the necessary support for them to achieve, regardless of where they study, what they study and to what level.

- Additionally, evidence suggests the restructure of the college sector has disproportionately disadvantaged disabled students. The Educational Institute of Scotland surveyed colleges in 2014 with results showing a significant decline, nationally, in the level of support available to students with ASN in Scotland's FE colleges – with significant regional differences in provision. At the time of the survey only 46 staff in Scotland held a Diploma in Special Educational Needs (or equivalent), this is a drop of 30% on previous years. Six colleges stated that they had no Diploma in SEN qualified staff[4].

- The EIS data also shows a year-on-year reduction every year from 2009-10 to 2012-13 in additional support needs student numbers. The number of DPG18 students in the colleges sharing data has dropped from 19,622 to 14,887 between 2009-10 and 2012-13. This is a reduction of 24%.

1.2 How could parity be achieved and how can we maximise the income available to students?

Ensuring that deaf young people and their families get **good advice and high quality information on what support they can get in future study is key in ensuring parity in funding levels.** Some young people are more comfortable and confident in seeking support and funding than others. Ensuring all eligible young people are aware of what support can be available while they are making decisions on their future is key.

1.3 How can parity in funding be achieved without having a negative impact on benefits?

1.4 What is the most effective way to determine which students are most in need of bursary support?

2 - A simplification and clarification of the systems used to provide financial support to students in Scotland today;
Rationale: to remove some of the unnecessary complexities and enhance the student experience

2.1 What are the key features of the current system that may deter or make it more difficult for students to access, or stay in college or university?

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[4] Educational Institute of Scotland, 2014, http://www.eis.org.uk/FELA_News/FE_ASNcuts_press.htm

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Research shows that deaf young people currently do not regularly receive transitional planning to prepare them from moving on from school. This undermines access to HE and FE. This is despite the statutory requirement for education authorities to provide this under the Education (Additional Support for Learning) (Scotland) Act 2009 Code of Practice. As a result, deaf young people are less likely to receive accessible information about their support options and rights and are more likely to experience delays in support being put in place at their chosen destination.

Within post-school destinations, a lack of effective support can undermine retention of deaf students. Those who use British Sign Language (BSL) as their preferred method of communication, for example, require the interpreter to have a high level of fluency which is not always available within Scotland's colleges and universities. Ensuring Communication Support Workers (CSWs) in schools and colleges are qualified to a minimum of Level 3 BSL standard so that they can effectively fulfil this role is vital. Also, it is beneficial for CSWs to hold a qualification in communication support in addition to a qualification in BSL. Colleges and Universities when producing their listed authority plans under the BSL (Scotland) Act 2015 should ensure that this is an area which they commit to improving.

The knowledge and advocacy skills deaf young people's parents/carers have is critical to supporting access and retention. University of Edinburgh research has found that where deaf young people came from lower socio-economic backgrounds, their parents/carers were less likely to have these skills, and this affected a young person's experience of additional support at school, transitional planning and getting the right support in place at their chosen post-school destination. This would be less of an issue if institutes were upskilled to ensure they had identified staff with specialist knowledge in assessing deaf learners needs an appropriate intervention.

2.2 Do any of the current rules and/or practices in place make it harder to access or maintain study?

Ensuring full linguistic access is critical for all deaf students to ensure they have an equal chance to succeed. The types of support required to achieve linguistic access will vary according to whether a deaf students preferred language is a spoken one such as English, BSL or a combination of these. The support could include deaf awareness training for staff, Electronic Note Taking, good quality acoustics and/or amplification through technology, lipspeakers and fully qualified interpreters.

In 2005 a report for the Scottish Funding Council,[5] concluded that "*a specific model of linguistic access provision for deaf students should be implemented across higher education institutions, including support for 'communities of deaf students' developing within higher education institutions – in order to guarantee full equality of opportunity and successful participation for deaf HE students.*"

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[5] Grimes, Thoutenhoofd and Brennan, 2005
http://www.ssc.education.ed.ac.uk/resources/deaf/deafstuds/intro.html

In promoting access and achievement for deaf students, Scottish Universities should consider offering more access courses and summer programmes to prepare deaf students for university. This targeted support could help students focus on core numeracy and literacy skills, which given the attainment gap that exists for deaf learners, many have not had the chance to develop to their full potential. Ongoing support for students to address literacy and numeracy skills may also support linguistic access and be very helpful for some deaf students. Providing support to deaf students in university is challenging given the national shortage of qualified interpreters, qualified Electronic Notetakers, lipreading tutors, Communication Support Workers and other specialist professionals. **We recommend that further investment into this crucial workforce is required to support disabled students' access to Scottish universities.**

For students who have BSL as their preferred language, high quality communication support is essential yet not always available within Scotland's universities. Best practice in supporting these students include providing qualified interpreters with a Level 6 BSL qualification accompanied by notetakers in lectures and tutorials. If a student requires more flexible support a Communication Support Worker may be required, however there can be issues with skills and shortages within this workforce. Permitting students to submit assignments in BSL format, which are translated by a qualified interpreter can also assist students who use BSL as their main language to overcome literacy barriers within HE.

Further Education

There is an urgent need to establish best practice standards in FE for deaf students and a means of demonstrating that provision is effective and meeting their needs. In Scotland there is clearly a need to understand the experiences of deaf college students in order to improve the support they receive.

As part of the first BSL National Plan, we have recommended that qualifications set within a strong regulatory framework should exist for all practitioners supporting the communication of deaf learners in BSL.

The British Association of Teachers of the Deaf have also recommended that more colleges make service level agreements with local authority hearing impairment services, to draw in specialist experience to the FE sector. Colleges often do not have the knowledge of how to meet the unique needs of the very small number of deaf learners they have. Service level agreements with local practitioners supporting deaf students aged 16 to 18 years old could strengthen their access and retention in FE.

Increased peer support initiatives would be very useful for deaf students in college and university. Deaf children and young people miss out on the incidental learning that their hearing peers absorb naturally from listening to the world around them. In a new college or university environment deaf young people are less likely to pick up on information that could be very helpful to them such knowing about student services, location of buildings, social events etc. Peer support and mentoring could help create more inclusive settings for deaf students, improving their confidence and retention.

2.3 How could the way in which financial support is delivered to students at college or university be improved?

Disabled Students Allowance –

Deaf students in HE are entitled to DSA, a non-means tested allowance which can be used to meet extra costs arising from a disability. DSA can be used to pay for specialist equipment and support workers (such as interpreters, notetakers and readers and proofreaders). The grant depends on the assessed needs of each individual student and is paid directly to students by the Scottish Awards Agency for Scotland (SAAS) to assist with the additional costs of studying for a degree. While there are some challenges with the current application processes, overall it is effective and DSA money is linked to specific disabled students. This means that DSA is effectively ring fenced as it only arrives alongside a student with assessed needs.

Research from the University of Edinburgh illustrates a clear benefit to students who received DSA.[6] Students in the study reported being generally satisfied with the support they received which overall they described as high. The study showed that disabled students who did not have the DSA had higher non-continuation rates than disabled students in receipt of DSA and their non-disabled peers. The evidence obtained from this research suggests that DSA acts as a protective factor against the drop-out of deaf learners in higher education.

However, the cap on non-medical Disabled Students Allowance (DSA) support of £20,000 per annum could mean that funding is insufficient for students who require communication support in all classes and lectures. For example, the average hourly rate of a BSL interpreter in Scotland is £35 per hour. With full time university courses typically requiring between 15 to 25 hours attendance per week, costs can quickly escalate. Some universities will pick up any shortfall in cost of support however the quality of this support can vary.

The DSA application and administration process also carries some challenges for deaf learners which we have outlined in question 3.

Extended Learning Support

FE colleges in Scotland are funded through the Scottish Funding Council (SFC) to meet the additional support needs of their learners. The Extended Learning Support (ELC) support funds amount to £50 million across all colleges. This fund supports colleges to provide additional support and services for learners on FE courses. As such, unlike the DSA approach, individuals in FE do not receive these funds directly. Rather, the college is expected to use this funding to put appropriate support in place.

We understand that this funding mechanism was recently reviewed and is to be replaced with Access and Inclusion Strategies. We understand that this will encompass specialist needs assessment and support for some student including those who are deaf. However, we are concerned that colleges may not allocate sufficient funds for deaf students who require a high

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[6] University of Edinburgh, October 2013, *Post-school transitions of people who are deaf and hard of hearing*

level of communication support. It can be challenging for colleges to meet the needs of students with low incident needs like deafness as they can lack specialism in assessing what support is required. It is vital that staff understand the needs of a wide range of deaf learners. Colleges should appoint and train a person with a certain level of expertise in the needs of deaf learners. They should also work in collaboration with other college support staff where the student has more than one issue. Without expert staff in each college, we are concerned that the needs of deaf learners may be overlooked.

We also have concern around the proposal not to flag students who get ELS and also getting rid of Personalised Learning Support Plans unless colleges want to use them. This opens up the possibilities of over claiming and potential fraud.

We welcome the recommendation around taking a more regionalised approach to deaf learners. This presents opportunities in Scotland to pool resources in order to put in place the specialist support deaf learners may require.

We believe that a replacement for Extended Learning Support should:
- Ensure there is sufficient funding is available for students with high levels of communication support,. Consideration should be give to setting up a top up system for those learners with high / complex needs.
- For low incidence needs, such as deafness, Colleges should identify a member of staff who specialises in assessing the needs of deaf learners.
- The quality of FE data in Scotland must be improved if the impact of the new system is to be properly assessed.
- Specialist provision for deaf learners must be safeguarded and enhanced in the new system.
- Safeguards must be implemented to ensure there is sufficient accountability of colleges in meeting their obligations to disabled students this could include publication of data in relation to outcomes and student progress.

Challenges

There continues to be a lack of data available about the experiences of deaf young people at college, how they are supported and the longer term outcomes they achieve. University of Edinburgh research suggests variation in the quality of support offered by colleges.

Among those taking part in the research, deaf students in FE were less satisfied with the support they receive than those in HE. Problems cited by students that they had experienced included lack of consistency of support, lack of specialist equipment, no extra allowances for printing credits and the need to rely heavily on peers for informal support. This may be a consequence of the different levels of funding for higher and further education.[7]

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[7] University of Manchester (2015) *Identifying effective practice in the provision and education support services for 16 – 19 year old deaf young people in Further Education in England*

Further research from the University of Manchester on the experiences of deaf students in FE found that:

- There was not an equality of opportunity for deaf young people across the different FE provisions;
- Uptake of learning support by deaf young people can be affected by its availability rather than by best fit to the learner's needs;
- There were no minimum standards or best practice guidelines against which FE environments could benchmark their provision;
- While there was a drive towards ensuring Communication Support Workers had at least British Sign Language Level 3 (approx a Higher), some colleges had Communication Support Workers with Level 1 or 2;
- Although the vast majority of deaf young people completed their FE course, nearly one quarter did not achieve any qualification at any level;
- The drop out rate for deaf students was twice that of the general population of students in FE.

Whilst these findings relate to experiences in England, we suggest the picture for deaf college students would be similar in Scotland. This is further exemplified in the latest Scottish Government attainment follow up data for 2015/16. This illustrates a 3.6% drop off in numbers of deaf young people in FE in the period between initial destination being recorded and follow up contact being made. This latest data illustrating a lack of retention is concerning.

3 - Better communication of the funding available, including a clear explanation of the repayment terms of student loans;
Rationale: to assist students and prospective students to understand what financial support is available and when and how they access it

3.1 What type of information on funding would be helpful to students – both prospective and continuing?

The DSA application and administration process can be challenging for deaf students. An NUS/LEAD survey in 2013 highlighted issues around lengthy application timescales, challenging logistics such as sending away receipts, and the need for improved information about the DSA.

We are particularly concerned around the consistency of support offered by Disability Offices at different institutions. For example, the aforementioned study showed that:-

- some students were contacted by Disability Advisors as soon as they were made an offer whilst others had their first meetings just before lectures started;
- students from some universities were given communication support and equipment before they received the DSA, while others had to wait for the DSA funding to come in before they could have notetakers or laptops;
- there was also variation in the continuity of support. Some participants reported that they had catch-up meetings with the Disability Office every year. Others were expected to take responsibility for organising their support after the first year. It is interesting to note here that students in the second category stopped seeking note-taking support after their first year.

3.2 How and where should that information be made available? Would a particular format be more helpful?

Ensuring information is accessible for prospective deaf students at transition stage. For example, ensuring video information is subtitled and in BSL.

3.3 When should potential students first be given information on financial packages of student support?

As early as possible during transition.

3.4 What role should colleges / universities/ schools play in providing information on student support?

3.5 What more could be done to support parents/guardians to better understand the student support funding available?

3.6 What could be done to help students understand more about student loans, including how and when they are repaid?

4 - Further consideration of the levels of funding required for all students and the funding mix.
Rationale: to provide more funding, particularly for students from the most deprived backgrounds, and funding choices for students

- Pupils with Additional Support Needs (ASN) are among the lowest attaining learners in Scotland. While some ASN are correlated to socio-economic deprivation (such as emotional factors) others are not, such as hearing impairment. As such, some of the lowest attaining pupils in Scotland have missed out so far on initiatives like the Attainment Challenge Fund.

- Research commissioned by NDCS (University of Edinburgh, 2013) has illustrated the "double disadvantage" that deaf learners experience when coming from socio-economically deprived backgrounds. This included having less information about post-school options and less parental advocacy.

- The Achievement and Opportunities for deaf students project,[8] also established that the effects of poverty have a profound impact on deaf children's achievement. The research identified that some education services have in place helpful schemes to support families living in poverty however this is not standard.

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[8] O'Neill et al 2014 See chapter 4 http://www.blendedlearning.me/DASS/site/reports/EDU%2037468%20-%20Nuffield%20Report%20MASTER%20v3.pdf

- It is crucial to consider the additional characteristics that individuals have which intersect with socio-economic deprivation, and undermine life chances. Poor emotional health and wellbeing may also undermine attainment and positive destinations. NHS figures suggest 40% of deaf children experience mental health difficulties compared to 25% of hearing children.[9] Communication difficulties, language development delay and social isolation may be some of the contributing factors to this higher prevalence.

More resources should be produced for all students at a disadvantage in the education system this must take into account pupils with ASN in addition to issues such as whether or not the student is from a deprived background.

4.1 Should a 'minimum income' guarantee be introduced across all students?

4.2 What should the 'minimum income' guarantee be, and why? Should it be linked to the Living Wage?

4.3 Under what circumstances should a 'minimum income' apply?

4.4 What is the appropriate balance of bursary / loans within a 'minimum income'?

4.5 Rather than only Higher Education students, should all students have the option to access student loans, regardless of their level of study at college or university (in addition to existing bursary entitlement)?

4.6 Are there ways that the terms and conditions attached to student loans (e.g. interest rate or repayment threshold) could be reviewed to support consideration of extension to all students?

5 - Any other comments, ideas and innovations
5.1 Please use this space to provide any other comments which you believe are relevant to the review. In addition, your ideas and innovative suggestions are welcomed to help inform our final report on how the student support system can be fit for the future.

- ➢ In light of the new duties around the British Sign Language (Scotland) Act 2015, we hope to see a fresh impetus on improvements in terms of widening access to further and higher education for deaf young people. Robust College and University listed authority plans are a necessity in achieving this.

- ➢ We recommend improved data collection to enhance understanding of where specific local interventions are required in post-16 support for deaf learners. This was highlighted in the previous Education Committee's Inquiry into the attainment of pupils

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[9] NHS (2005) Mental Health and Deafness: Towards Equity and Deafness. Department of Health

with a sensory impairment, with a commitment from the Minister to address these gaps. The Skills Development Data Hub does not currently collect data on hearing impaired school leavers, thus it is not possible to track these outcomes beyond six months from the point of leaving school. We recommend this is addressed within SDS data collection. Better data collection would also allow any changes in support to be monitored by the Government.

➢ There is currently no qualifications or regulatory framework around the use of Communication Support Workers or interpreters in education settings. This means there is inconsistent provision and disparity in the quality of support provided to students. A review of the qualification and skills base held by those professionals (in colleges and universities) would be helpful to inform the development of a qualifications framework for this vital workforce. This work could inform other gaps in regulation of interpreters, including across employment and health.

➢ Improved transition support for deaf learners moving on from school is vital to improving post-school destinations for this group. Education authorities must ensure that national policy aspirations are being implemented on the ground around formal planning, which should start at least 12 months before a young person is due to leave school, or earlier. A stronger role for Education Scotland in inspecting and monitoring implementation of transitional support and outcomes would be beneficial. This planning could include improved awareness about DSA for professionals and young people.

➢ Increased peer support initiatives within universities would be very useful for deaf students. In a new university environment deaf young people are less likely to pick up on information that could be very helpful to them such knowing about student services, location of buildings, social events etc. they are also more likely to experience social isolation and as previously mentioned, mental ill health. Peer support and mentoring could help create more inclusive settings for deaf students, improving their confidence, wellbeing and retention.

➢ We are committed to working collaboratively with all national and local partners to improve the life chances of deaf young people. We are keen to work in partnership with local authorities to help develop their transition offer for deaf young people by focusing on the use of our Template for Success document, emotional health and wellbeing "Healthy Minds" training and developing local transition forums for professionals supporting deaf young people in their area.

E - Responding to this consultation
To help us analyse the responses please use the online system wherever possible. Visit
https://consult.scotland.gov.uk/student-support/financial-support-for-students/ to submit your
response.
If you are unable to respond via the online system you can download a word version of the form
and send your response:
by email to: StudentSupportReview@gov.scot

by post to: Jennifer Finn, Higher Education & Science Division, Directorate for Advanced Learning & Science, The Scottish Government, 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU.
The deadline for this consultation is 31 August 2017. Any enquiries should be directed to StudentSupportReview@gov.scot