

Consultation Response Form

Your name:

Danielle Gazi

Organisation (if applicable):

National Deaf Children's Society Cymru

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Responses should be returned by **17th February 2020**

to

Higher Education Division

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

or completed electronically and sent to:

e-mail: HEDConsultationsMailbox@gov.wales

Question 1: Do you agree that one allowance would be better than four separate allowances?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

We agree that one allowance will give greater freedom of choice to students. Our own research echoes The York Report’s findings that the current capped allowance sees deaf students struggling to secure suitable support for non-medical helpers. We are pleased to see the offer extended to postgraduates in line with the new postgraduate course fee funding.

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Supporting comments

As an organisation, we have a number of concerns pertaining to the proposal of an ‘off the shelf’ package of support.

1. **Not all D/deaf students require the same support-** The proposed ‘package of support’ approach will only work if there is a full understanding of the variety of support deaf students require and a fundamental appreciation that not all deaf students require the same help- i.e. some are BSL users, some use technology aids etc. Individual deaf students require a **full** and proper consultation with professionals who possess in depth knowledge of deafness and education to allow them to feed in their knowledge and expertise in order to shape the package of support. There should then be a follow up consultation for professionals to review and feedback on the proposals. This consultation is **not** a suitable platform for this and views/ engagement should be sought separately and in a way that allows for in-depth participation/ contribution.
2. **Full assessment entitlement-** It must be made very clear that students are entitled to a full individual assessment at any point in their studies, even if they have previously accepted the ‘off-the-shelf’ package. Students should not feel, or be made to feel, that they are a burden to ask for a full review. Provisions

must be in place that make this an easy process for deaf students, i.e. readily available BSL interpreters, communication support etc. The re-assessment/ individual assessment should not be delayed or jeopardised because of communication access requirements.

3. **Qualified Specialist Advisors-** We note that the consultation document makes reference to assessments being conducted by a ‘specialist advisor’ (p.14). We would seek clarification as to how this will be implemented given there are currently no qualifications required to become a DSA assessor. Simply allowing students a full assessment if requested will serve little purpose if the assessor possesses limited or no knowledge of a student’s condition/s. Our recent Higher Education survey highlighted that deaf students felt that assessors did not understand their condition which led to confusion around what support would be required, e.g. note takers being prescribed without genuine need. Assessments must, therefore, be conducted by assessors with specialist knowledge of the student’s disability or additional needs.

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Supporting comments

We do believe that the Higher Education Provider (HEP) should be properly involved in ensuring students are provided with the support they require, as is already their duty under the Equality Act 2010. However, we have a number of concerns that must be addressed.

1. **National Service Standards-** The document states that “each HEP would be expected to adopt its own service standards” (p.17). We do not believe this to be an adequate solution. In order to ensure parity and transparency across all universities, there needs to be national service standards that each HEP adheres to. The standards should, among other elements, include:
 - detailed outlines of what support packages should include for deaf children;
 - how to ensure that the assessment venue is suitable for a deaf student’s needs, e.g. suitable acoustics etc.;
 - clear guidance on the qualifications Non-Medical Help (NMH) must possess.

In order to ensure sufficient and implementable quality assurances are in place, we believe that Student Finance Wales should play a part in monitoring these standards to ensure they are being adhered to.

The consultation states, “DSA funding will not be provided for anyone to carry

out NMH support that is not suitably qualified” (p.19), but fails to stipulate how this will be enforced or outline what “suitably qualified” means. Ensuring disabled students have access to NMH falls under the legal duty for universities to provide ‘reasonable adjustments’ under the Equality Act 2010 and a set of National Standards would go some way to assuring potential and existing students that the HEP is able to meet their needs. A set of National guidelines will help avoid confusion and will assist students who wish to make a complaint in holding their HEP accountable.

2. **Complaints-** Following on from our above point, HEP must have an easily available and accessible complaints procedure in place. This process must be clearly accessible to deaf students. They must be able to submit complaints in a way that is suitable to them and any follow up communication should be conducted and delivered through their preferred communication method. This process should be monitored by Student Finance to ensure Universities are being held accountable and incidences of Universities receiving high amounts of complaints in relation to DSA assessments are flagged and followed up. Universities must also make students of their right to take their complaint further, for instance to the Office of the Independent Adjudicator for Higher Education or similar. Once again, information on this process should be clearly sign posted.
3. **Assessment venue suitability/ accessibility-** If assessments are to take place at the HEP site, then the acoustics, setting and communication support offered must be suitable. It is essential that assessment venues are accessible to students with all disabilities and levels of access needs. Older venues should be adapted to be acoustically accessible and new buildings should adhere to the building standard regulations on acoustic design- which you can find here <https://www.gov.uk/government/publications/bb93-acoustic-design-of-schools-performance-standards> HEP’s must also make *prior* contact with deaf students to ascertain what their communication requirements are ahead of the assessment, i.e. if they will need cued speech, a BSL interpreter etc. present at their assessment.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

We have a number of suggestions regarding awareness raising and DSA.

1. **Raise awareness early-** DSA needs to be publicised and students/ parents made aware of its availability early in a child's secondary schooling. Ideally this would take place in year 8 when learners start choosing GCSE/ qualification options. Awareness also needs to be raised amongst young adults undertaking qualifications such as Access courses as well as via any development opportunities workplaces offer (for example, workplace funded degree/ postgraduate qualifications). Our Higher Education student survey shows that those students who did not claim DSA did so, not because they did not need the extra support, but because they had not been provided with adequate knowledge or understanding of the help and support available. It is, therefore, essential that students are made aware of DSA both early on and continuously through their schooling and the Higher Education application process.
2. **Swifter responses from GPs-** GPs must be aware of the importance of quickly fulfilling requests for evidence. Examples of requests being questioned/ delayed is not acceptable. This could be facilitated by a communications campaign detailing what is expected from GPs as part of the DSA process.
3. **Need for Specialist Careers Advice-** The introduction of the new ALN Code of Practice in Wales may potentially see the removal of specialist careers advisors for deaf young people. Specialist advisors would be well placed to inform young people of DSA and, furthermore, the Access to Work options available to them if they chose to work whilst attending university.
4. **Utilise Teachers of the Deaf (Q/TODs)-** Professionals such as Teachers of the Deaf are well placed to inform young people about DSA.

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

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

Comments

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

Comments

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