



Permanent Secretary

Sanctuary Buildings 20 Great Smith Street Westminster London SW1P 3BT
tel: 0207 340 7414 permanent.secretary@education.gov.uk

Chair of the Education Select Committee
Helen Hayes MP

By email: educom@parliament.uk

10th January 2025

Dear Helen,

We are writing to the Committee following its request for a response to the previous Committee's [letter](#) of 23 May 2024. Baroness Barran, then Minister for School System and Student Finance, and Chris Larmer, Chief Executive of the Student Loans Company (SLC), presented evidence to the Committee on 23 April 2024 on the Disabled Students' Allowance (DSA). Due to the calling of the general election on the same day and the consequent dissolution of Parliament, we did not respond to the letter at the time but are doing so now at your request. Chris Larmer and I are responding on behalf of the SLC and Department for Education respectively.

To set out the background to the recent reforms, enhancing the DSA service is a priority for the SLC and they are committed to delivering the best possible experience for disabled students.

The Department for Education and the Welsh Government commissioned SLC to put in place contracts for the provision of needs assessments, assistive technology and assistive technology training, and aftercare support. The main reasons for this decision were that we had significant concerns that value for money was not being achieved, that the market was not functioning well, that there was significant potential for conflicts of interest, that the lack of contractual arrangements meant that our oversight and governance was weaker than it should have been, and that the service to students was not optimal. These contracts are therefore designed to:

- Secure better value for money for the student and the taxpayer
- Enable SLC to hold suppliers to account for their performance and quality through formal contractual controls, and
- Improve the application journey for students by having a single point of contact (a contracted supplier) for these services.

SLC's new service model was introduced in February 2024 with two suppliers, Study Tech and Capita, who are now responsible for the provision of these services. There has been no change to DSA policy or to eligibility or entitlement rules. Students continue to apply to SLC for DSA, and once SLC has processed their application and confirmed their eligibility they are assigned to Capita or Study Tech for these

services (which were previously carried out by a range of independent suppliers with no contractual framework in place).

The background to these reforms has led to some concerns from previous suppliers of assessment services and technology about SLC's new service model despite the clear benefit to the student and the taxpayer. Despite these challenges, the new service model has been implemented with customers now being served by SLC and the two new primary suppliers. SLC is focussed on delivering the best possible service for customers while implementing enduring reforms to the DSA process that will benefit students for years to come. As is the case in delivering any significant and complex change, implementation challenges will inevitably arise. One of the key benefits of the new service model, however, is that we now have full end-to-end visibility of the DSA process for the first time. Consequently, SLC are able to proactively respond to and mitigate issues earlier than previously would have been possible. SLC closely monitor processing times and work with the suppliers to ensure that customers can be offered their Needs Assessments within a suitable timeframe. Historically, the end-to-end DSA customer journey was too long and complex. The new model is starting to remove that complexity, with the new suppliers supporting students through the journey; however, we acknowledge that the current end to end time is still too long. To reduce this time, both suppliers have recruited more Needs Assessors to increase capacity. SLC has also increased capacity in its DSA teams which has boosted capacity by approximately 37% enabling SLC to prioritise the processing of DSA application forms, medical evidence and Needs Assessment Reports to ensure customers are getting their support as quickly as possible.

We have responded in detail below to each of the questions outlined in the letter.

1. Are you comfortable that these are the correct KPIs to use in holding the suppliers to account? Are you making further any qualitative measurement of students' experiences?

The 23 contractual KPIs which SLC has agreed with Capita and Study Tech (available online at <https://www.gov.uk/government/groups/ds>) are routinely monitored and subject to monthly review. They cover six key categories, including needs assessment provision, equipment provision, training provision, the provision of support, including repairs and replacements, complaints handling, and compliance with commercial terms. SLC published a DSA Performance Pack in December which includes a summary of 11 available KPIs covering needs assessments, assistive technology provision and training. While all 23 KPIs are monitored, SLC (as planned) have not yet published performance results against all KPIs in order to ensure that sufficient volumes of customers have completed the end-to-end process. Further customer support and general contract KPIs will be publicly available from March 2025

SLC are undertaking a 3-6 month KPI baselining period, beginning in January 2025, to assess the KPIs following the initial performance of the service since February 2024. As part of this, SLC will consider potential iterations to ensure that they are as effective as possible and will engage the members of SLC's DSA Quality Committee on this review process.

SLC runs a regular student survey which asks students about their satisfaction with the different elements of the contracted service and provides the opportunity for students to give qualitative feedback.

- 2. Is the Department comparing course completion rates for students receiving DSA-funded support before and after these reforms? Will you share this analysis with the Committee?**
- 3. Has the Office for Students (OfS) been given any role in monitoring outcomes for students? How will the Department be engaging with the OfS to review course admission and completion rates?**

The OfS considers data relating to student characteristics as part of its risk-based approach to regulation.

The OfS maintains an equality of opportunity risk register that sets out the risks for students by characteristic (including for disabled students), and the OfS sets out in regulatory guidance the expectation that providers use this insight to address risks to equality of opportunity.

The OfS makes various data sets publicly available that break down key data points across a student journey by student characteristics. Providers are expected to use this to set their Access and Participation Plan and in their Teaching Excellence Framework submissions.

The panel assessing awards for the Teaching Excellence Framework also considers the extent to which each provider is delivering excellent student outcomes that go beyond the OfS' baseline quality requirements. The panel is presented with 'splits' of the continuation, completion and progression measures for different student groups, including one which shows the outcomes for students that have declared a disability and those that have not, and takes these into account in reaching its judgements.

Tables 1 and 2 below set out data published online by the OfS on the outcomes for disabled students in higher education¹. This data includes all students who have declared a disability, not just those in receipt of DSA (as the purpose of DSA is to fund additional support required on top of the reasonable adjustments provided by higher education providers, disabled students whose needs are fully met by these reasonable adjustments will not require DSA).

Table 1: Full-time undergraduates

Measure	Disability reported	No disability reported
Continuation (AY2021/22)	87.3%	87.1%
Completion (AY2018/19)	85.7%	87.9%
Attainment (AY2022/23)	78.3%	76.8%
Progression (AY2020/21)	71.4%	73.0%

¹ <https://www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/data-dashboard/>

Table 2: Part-time undergraduates

Measure	Disability reported	No disability reported
Continuation (AY2020/21)	54.8%	61.1%
Completion (AY2016/17)	48.7%	60.7%
Attainment (AY2022/23)	70.9%	73.8%
Progression (AY2021/22)	76.0%	81.4%

Notes to Tables 1 and 2:

- The academic years in brackets are the years to which the data refers. These are the latest years for which data is available.
- “Continuation” refers to the percentage of first-year students who continue their studies after 12 months (full-time students) or 24 months (part-time students).
- “Completion” tracks students from the date they enter a higher education provider and considers their completion outcomes after four years (full-time students) or six years (part-time students).
- “Attainment” refers to the number of students who were awarded first class or upper second class degrees.
- “Progression” refers to the number of students progressing to highly skilled employment, further study, or other positive outcomes 15 months after gaining their qualification.

4. Will you publish the customer satisfaction survey scores each quarter and include details of how samples were selected?

Yes, every customer who completes the DSA process and receives DSA funded equipment is issued a customer satisfaction survey. The customer satisfaction survey results are published alongside the KPIs in the DSA Performance Pack.

5. Are the ‘quality standards’ you referred to additional standards to the 23 KPIs? If so, can you commit to publishing those quality standards?

The quality standards are the 23 KPIs, which as referenced above are published at <https://www.gov.uk/government/groups/ds>.

6. Can you please clarify the process the Department and SLC went through to determine the KPIs and quality standards?

SLC reviewed the KPIs in place under the pre-reforms service model and used these as a baseline to develop the new KPIs which are designed to deliver an improved customer experience. SLC engaged with their DSA Customer Panel and other service users to understand the service level and experience customers expect during their DSA journey.

Furthermore, SLC also established a sub-group of its existing Disabled Students’ Stakeholder Group (DSSG), specifically to provide feedback on the procurement. This group was used as a forum to discuss how the new KPIs could be defined and

measured at each stage of the customer journey. SLC also invited written contributions from members.

7. How will you ensure greater transparency and communication with stakeholders over these KPIs and your monitoring of the suppliers' performance against them?

As included in the response to question 1, above, in early December 2024 SLC published a DSA performance pack which is available at <https://www.gov.uk/government/groups/ds>. This includes a summary of 11 available customer KPIs covering needs assessments, assistive technology provision and training. While SLC monitor all 23 KPIs, SLC has not yet published performance results against all of them in order to ensure that sufficient volumes of customers have completed the end-to-end process first. Further customer support and general contract KPIs will be available from March 2025.

SLC has been sharing performance updates with key stakeholder groups since the launch of the new service in February 2024 and has committed to publish the KPIs on a quarterly basis.

SLC meets regularly with a range of stakeholders including disability practitioners, higher education providers and third sector organisations supporting students with their DSA to listen to their insights and feedback. SLC further enhanced its approach to stakeholder engagement following the Education Select Committee hearing on DSA in April and has subsequently introduced a monthly DSA Operations Group following feedback from the sector. SLC issued a written sector-wide DSA update on 12 July 2024 and 15 November 2024.

Since April 2024 SLC has held several bilateral meetings with key stakeholders including with representatives from the National Association of Disability Practitioners (NADP), Thomas Pocklington Trust and Universities UK.

SLC has also facilitated the following stakeholder meetings.

DSA Quality Committee, 25 June, 9 September, 22 November

The DSA Quality Committee was set up:

- To represent the interests of students with a range of disabilities to ensure that the new commercial model meets the needs of students.
- To provide independent validation that the suppliers are adhering to the agreed quality standards and that these standards are driving the intended outcome of an outstanding customer experience.

Disabled Students' Stakeholder Group, 10 July, 7 November

This group reviews and monitors the application processing arrangements for the service to disabled students at key points in the annual application cycle in order to:

- Bring external insights and experience to bear in identifying and resolving issues.
- Raise concerns and challenge processes.

- Support SLC and stakeholders through joining up communications to students and any other appropriate actions to help achieve the smooth delivery of the DSA service.
- Provide specialist input into information and guidance resources and content developed specifically to explain DSA.
- Review changes and improvements to the DSA service.

DSA Operations Group 27 August, 3 October, 13 November, 17 December

This group was established to provide a monthly forum for practitioners to:

- Provide feedback and insights on the DSA customer journey.
- Highlight any emerging or potentially systemic issues or concerns in the sector relating to the operational delivery of DSA.
- Create a feedback loop between practitioner organisations and SLC to support the running of the DSA service.

DSA Customer Panel, 27 Sept 2024

This panel was established to provide feedback and input as the DSA reforms project progressed. It sits alongside SLC's main Student Finance Customer Panel and other user experience work that SLC regularly undertakes to ensure that customers receive the best possible experience from SLC.

Members contribute to SLC's understanding of the needs and experiences of DSA customers and how the service can be continuously improved, via:

- Focus groups to share opinions on a specific topic or issue or provide answers to a set of questions.
- Workshops to explore and discuss a topic or issue in depth through a structured approach.
- Challenge panels to provide constructive feedback.

Panel members are asked to:

- Share their personal experiences of DSA.
- Share the experience of others.
- Help inform and shape the experience SLC provides to customers in receipt of DSA.
- Provide feedback on SLC's procurement exercise for the supply of needs assessments, assistive technology and assistive technology training and future DSA reform projects.

SLC is continuing to keep the membership of its stakeholder groups and fora under review, and to work with shareholders and Chairs to consider potential new members. SLC colleagues also attend:

- The Disabled Student Commitment Advisory Group.
- North and South Wales DSA forums.

SLC has also contacted all students who received DSA support under the pre-reforms model to advise them of the new service and the steps to take if they need further support.

8. Is the Department monitoring the range of assistive technology suppliers and products being recommended to students, and how these compare with the pre-reform system?

Yes, SLC maintain ownership and vigilance of the equipment and software catalogues used by both suppliers. Comparison reports are undertaken on a quarterly basis to identify any significant volume movements and trends, with a view to ensuring that no conflicts of interest are prevalent and that procurement and distribution of products and software is done transparently.

9. Can you tell us what action has been taken, following the oral evidence session, to revisit the membership and remit of the DSA quality committee, to ensure that it is fit to deliver what is expected of it?

SLC has committed to review the KPIs from early 2025. At this point a year of processing information will be available. Aligned to this activity, we will engage the Quality Committee and other stakeholders and revisit the membership and remit of the DSA Quality Committee. We intend to continue to ensure that the Quality Committee membership is restricted to stakeholders who have no commercial interest in the provision of needs assessment services, assistive technology and assistive technology training and aftercare.

10. Will you commit to consulting with all stakeholders at the beginning of 2025 to seek evidence from their perspective of the impact of these reforms, and to publish their evidence and the Department's and SLC's responses to it?

As outlined above, SLC is undertaking extensive stakeholder engagement on an ongoing basis and responding as quickly and efficiently as possible to any issues identified. SLC is also continuing to undertake regular student satisfaction surveys, the results of which are routinely shared with stakeholders and are published in the DSA performance pack referenced above. We therefore consider that a separate consultation exercise at the beginning of 2025 is not necessary.

11. Will you commit to publishing each month the proportions of face-to-face and remote needs assessments performed by each supplier, and how this compares with the proportions in a preCovid-19 pandemic year?

Prior to the Covid-19 pandemic, needs assessments took place face-to-face by default, with only a very small number of needs assessments taking place remotely on a "by exception" basis with prior authorisation from SLC. When the Covid-19 pandemic broke out, needs assessments largely moved online as a result. Once Covid-19 restrictions were lifted, DfE confirmed that students would continue to be able to choose a remote needs assessment if they wished without the need for any prior authorisation by SLC, and that all assessment centres would therefore need to be able to provide either remote or face-to-face needs assessments, at the student's choice. This policy change, which was unrelated to the introduction of the new DSA service, means that it is not relevant to compare the proportion of students having remote needs assessment after this policy change to the proportion of students having remote needs assessments before this policy change. The key point is that

students should have a free choice of whether they have a face-to-face or a remote needs assessment, and the contracted service has been set up on this basis.

The suppliers must ensure these options are made clear to the student in their communications and online platforms. SLC provided both suppliers with the information that they must make available to customers prior to their needs assessment, to help them make an informed choice.

SLC have created a new Needs Assessment Charter which will help inform students about what they should expect from their needs assessment, including that they can choose a face to face or remote option, and how long they should expect the appointment to last. Students should always be given the option of a face-to-face appointment particularly so that any potential assistive technology or ergonomic equipment can be demonstrated in person.

12. Will you commit to publishing the locations of the physical assessment centres being used by each supplier to deliver face-to-face needs assessments? And to publish a list of assessment centres which have closed?

The locations for face-to-face needs assessments offered by the contracted suppliers across all geographical zones are published at:
<https://www.gov.uk/government/publications/disabled-students-allowance-dsa-assessment-centre-locations>.

As expected, previous needs assessments suppliers who are not involved in the new service have stopped offering DSA needs assessment services to new students, as all new DSA needs assessments are being allocated to the contracted suppliers. While SLC maintains records of these suppliers for administrative purposes, we do not think it appropriate to publish these.

13. Can you share with the committee the evidence which supports your suggestion that some students “feel that the needs assessment part is superfluous and they would rather go straight to the purchasing of the equipment”?

As noted at the session in April 2024, we have received feedback from some students that they feel that they know what they need in the way of support and therefore find the needs assessment process a barrier to getting that support. Based on that feedback, we have been considering the possibility of offering some students a choice between attending a needs assessment or receiving a set package of support. If this approach were implemented, we would ensure as a safeguard that any student who chose a set package of support would retain the option to have a needs assessment at a later stage if they felt one was required.

14. Can you provide further details on how you propose to monitor the new suppliers’ adherence to the standards around training, supervision, and continuing professional development of assessors and trainers?

SLC maintain a Supplier Assurance Framework audit document, with Section 12

relevant to Needs Assessors Skills & Accreditation Alignment. The suppliers must provide:

- Details of control process(es) and procedure(s) that ensures the matching of Needs Assessor(s) to the individual students needs and specific disability(s), including all aspects of communication support.
- A live database of all registered Needs Assessors supporting DSA, whether employed, contracted or freelance, with details of skills, experience, and accreditations to specific disability types.
- Regular monthly management information and reporting data that validates that an appropriately skilled and accredited Needs Assessor(s) was individually matched and allocated to conduct the student's needs assessment.
- Details of any relevant risks or impacts during the implementation of further enhancements.

15. What you are doing to understand the qualitative aspects of assessments being delivered (e.g. how long they last, what topics are covered, what equipment is demonstrated, how the student felt about their experience)?

SLC is committed to ensuring that students receive the best possible experience and has published a new Needs Assessment Charter which will help inform students about what they should expect from their needs assessment, including how long, on average, an assessment may take.

As part of its auditing process, SLC are undertaking a programme of visits to needs assessments centres across all areas. The suppliers also perform their own quality assurance which SLC will verify. Options for independent case reviews, side by side practice, mystery shopping and remote quality monitoring are being considered and SLC will be engaging with the DSA Quality Committee early in 2025 to seek their input on this approach.

16. Finally, we asked about the Department's recent call for evidence on further reforms to the provision of non-medical help. Our question referred to the context of reforms made in 2015 to the DSA, specifically the removal of certain kinds of bands 1, 2, and 3 non-medical help services from the scope of DSA-funding, with the expectation that these would be picked up by higher education providers as part of their duties under the Equality Act 2010. You committed to send the Committee further detail on the overall and per-student funding levels over time, including before and after the 2015 reforms. We would be grateful if you could include this alongside your responses to the other questions in this letter.

To clarify, the change whereby responsibility for the less specialist non-medical help roles was transferred from DSA to higher education providers under their Equality Act 2010 responsibilities was made from the 2016/17 academic year.

Table 3 below sets out a breakdown of DSA expenditure by category, Table 4 below sets out the number of students awarded DSA, and Table 5 below sets out the average DSA award per student. Each table includes the academic years between 2013/14 and 2022/23.

When reviewing these tables, please note the following:

- The tables include full-time and part-time undergraduate students only. It is not currently possible to break down expenditure on postgraduate DSA into separate categories.
- “General” includes the cost of the needs assessment and other items: additional printing costs, additional accommodation costs, etc.
- Travel expenditure was affected by the Covid-19 pandemic in AY2019/20 and AY2020/21 because due to a lot of teaching moving online fewer student journeys were being made to their institutions and back.
- Equipment expenditure over this period was affected by the decision to introduce a £200 student contribution towards the costs of a DSA-funded computer in AY2015/16, and by SLC’s implementation of an e-quote system in 2021 which resulted in price savings being made on equipment.
- Non-medical help expenditure over this period was affected by the change in 2016/17 whereby responsibility for providing less specialist non-medical help moved from DSA to higher education providers under their Equality Act 2010 responsibilities.
- AY2022/23 is the last year for which we have final data. The reason for the large time lag in the DSA data is because SLC continue to receive and process invoices for DSA support for at least several months after the academic year when the support was provided. This means that DSA payments data is not finalised until the August a year after the end of the academic year to which it relates.
- The expenditure on DSA over this period (set out in Table 3) was also affected by changes in the number of recipients (set out in Table 4).

Table 3: Breakdown of DSA expenditure

Academic year	Non-medical help (£m)	Equipment (£m)	General, including needs assessments (£m)	Travel (£m)
2013/14	73.03	37.58	25.03	4.82
2014/15	76.05	34.29	25.27	4.97
2015/16	72.34	22.23	24.53	5.19
2016/17	58.54	18.58	22.85	6.17
2017/18	52.04	26.70	24.38	7.61
2018/19	51.21	34.97	27.88	9.80
2019/20	52.59	40.11	28.88	7.88
2020/21	60.76	49.52	31.88	3.39
2021/22	58.47	49.06	34.20	9.71
2022/23	60.78	52.62	34.79	14.79

Table 4: Number of full-time and part-time undergraduates in receipt of DSA

Academic year	Number of students (000's)
2013/14	62.84

2014/15	63.34
2015/16	62.64
2016/17	60.38
2017/18	60.22
2018/19	65.14
2019/20	68.51
2020/21	74.63
2021/22	78.64
2022/23	77.94

Table 5: Average DSA award per student

Academic year	Average DSA award per student (£)
2013/14	£2,235
2014/15	£2,219
2015/16	£1,984
2016/17	£1,758
2017/18	£1,839
2018/19	£1,901
2019/20	£1,890
2020/21	£1,950
2021/22	£1,926
2022/23	£2,091

We hope that this letter addresses the questions raised by the Committee. If further information is required on any of the points raised above, we would of course be happy to assist.

Yours sincerely,



**SUSAN ACLAND-HOOD
PERMANENT SECRETARY
DEPARTMENT FOR EDUCATION**



**CHRIS LARMER
CHIEF EXECUTIVE
STUDENT LOANS COMPANY**