INDEPENDENT REVIEW OF FINANCIAL SUPPORT FOR STUDENTS IN SCOTLAND

Consultation Paper June 2017
Response deadline Thursday 31st August 2017

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

Are you responding as an individual or an organisation?

☐   Individual

☐X   Organisation

Full name or organisation's name

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

☐X   Publish response with name

☐   Publish response only (without name)

☐   Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

☐X   Yes

☐   No

6.1 If you are responding in an individual capacity, which of the following best describes your background?

a) Currently a student studying a Further Education (FE) course at a College

b) Currently a student studying for a Higher National Certificate (HNC) level qualification or above at a College

c) Currently a student studying a course at a University

d) Prospective student

e) Employed in an education institution

f) Other (please specify):_____

6.2   If you are from an educational institution please provide:

a) An indication of the number of students enrolled

b) Geographical location

c) Other (please specify):_____

Thanks

Thank you for taking the time to complete the consultation, we welcome all views. The final report will be published in the autumn.

Lead Scotland is a charity that enables disabled adults and carers to access inclusive learning opportunities. At a local level, we do this by providing direct support to learners through flexible person-centred learning opportunities and individualised guidance and support to help them plan their learning journeys. At a national level, we provide information and advice on the full range of post-school learning and training opportunities, as well as influencing and informing policy development.

Disabled people account for a significant proportion of Scotland's population, and make a vital contribution to our economy, culture and public life. Yet, they experience considerable inequalities in relation to education, employment and overall life chances. In comparison with their non-disabled counterparts, disabled people are around twice as likely to be unemployed[1], around three times as likely not to hold any qualifications[2] and twice as likely to live in poverty[3].

Removing the barriers to inclusive learning and employment is therefore vital in terms of improving educational attainment and earning potential, reducing reliance on welfare benefits and facilitating access to life-enhancing experiences.

The Scottish Government's refreshed Employability Framework recognises the effect of recent developments on individuals' employability and life chances, including:
- The difficult economic conditions
- The ongoing effects of welfare reform
- The reform of public services and recent spending cuts
- Measures introduced through the reform of post-16 education

Many of these developments disproportionately affect people with additional support needs, making it imperative to work towards improving employment outcomes for a group already facing significant barriers to the labour market.

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[1] The Annual Population Survey, March 2013
[2] Labour Force Survey, Quarter 2, 2012
[3] Employers' Forum on Disability, 2012

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

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

> **Yes absolutely, the distinction/difference in funding offered should be based on circumstance, not level of study. Many of the disabled people contacting our helpline looking to access education are independent adult returners and not dependent on parental income or have partners able to financially support them.**

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

> **Funding should be offered to students according to their household income levels, their circumstances and their level of need, rather than whether they are studying at FE or HE level. Align the support up with the benefits system to ensure students who are entitled to benefits can actually claim them and student income doesn't have a negative impact on benefits. Offer a more grants based system and higher maintenance bursary to both FE and HE students facing financial hardship and in particular circumstances.**

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

> **Offer a level of maintenance support to students entitled to benefits that will not have a negative impact on the amount of benefit they can receive after disregards are applied, and top this up with financial support that is protected from the benefits system, i.e. payments for study related costs that do not affect benefits.**

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

> **Assess their full circumstances, caring responsibilities, health/disability, current benefit status as well as entitlement to benefits when they start studying, and also look at access to public funds as well as their household income.**

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?

We provide a helpline service to disabled people and carers who are within education or looking to access education. Evidence from our helpline suggests the current student finance support system prevents some people from accessing college or university due to the dramatic drop in income they would experience were they to start studying and move off benefits. For example, with the new Universal Credit system, one caller was going to lose out on over £400 per month should they start college, which meant they were not going to have enough money to pay their rent. This caller had a long term health condition and had been out of work for a long time, but they finally felt ready to make a positive change, retrain and develop their employability skills. However after I informed them of the loss of income they would face, they had to make the decision not to take up the course of study they had been accepted onto, instead choosing to remain on benefits. Some ill/disabled students can only access benefits if they also receive DLA or PIP, however not everyone is entitled to these benefits, especially with the changes following the introduction of PIP assessments. These students are then losing access to benefits but may not be able to work to supplement their income. The student finance system has to complement the benefits system to incentivise people to take up learning opportunities. Many people will therefore be unable to study full time and may have to study part time, however there are a limited number of courses/subjects available on a part time basis, so choices become reduced which can impact on motivation and ultimately become another barrier to taking up appropriate education.

Some disabled people contacting our helpline have indicated the level of debt they would graduate with is too high, amid concerns over low employability rates and barriers to employment for disabled people. Recent research suggests disabled people are twice as likely to be unemployed and/or living in poverty in comparison to non-disabled people, so we would like to see a system that reduces the need to accrue high levels of debt.

We have also received evidence on the helpline and from professionals across the sector suggesting the level of DSA available to disabled students is not always sufficient to cover the cost of support required to attend higher education. This is particularly relevant for Deaf people requiring BSL interpreters as the non-medical personal help (NMPH) allowance of £20.5K per year is not always enough to cover the costs of BSL interpreters for the full programme of academic activities. We are also aware of some colleges who have had to turn down Deaf students looking to access FE courses due to a lack of funds to cover all the costs of BSL interpreters.

Additionally we are aware of discrepancies over the level of social care support offered to disabled students with more complex needs. Some local authorities have said it is not within their policy guidelines to provide support for a person to attend college and have said it's an educational duty, while the colleges' response it that it's not an educational duty but a social care one, leaving many young people without the funding for the support they need in order to attend college. One social worker commented to me that if a young person needed one to one support to attend college, then they would question whether college is the right place for that individual in the first place. Clearer enforced legislation in addition to clearer guidelines through an updated version of Partnership Matters to clarify these responsibilities, with more case studies and examples of this working in practice would help.

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

We receive multiple calls on the helpline from disabled people and their families, concerned about covering the cost of transport due to colleges refusing to provide any travel bursary funds to disabled people who are in receipt of the mobility element of DLA/PIP. Colleges often state they are following SFC policy rules on this, however the policy guidelines state colleges have the discretionary power to 'top up' but not duplicate DLA/PIP funds, however we know from the helpline that this does not always happen. One parent who contacted the helpline recently advised the cost of transport for her son to attend college week would amount to £210 per week due to his high mobility needs. The college declined a request for travel bursary support though because he is in receipt of DLA – but his DLA would only have covered one week out of four. We have heard multiple similar stories like this on our helpline and are aware of students feeling they cannot take up a place of study because of it or are being forced to drop out because they cannot afford the transport costs. Additionally, disabled people have commented to us that they have other mobility related costs outside of getting to and from college, so using DLA/PIP solely for this is impacting on helping them to retain their independence in other areas of their lives.

We are also concerned about the rules and rationale surrounding eligibility for part time students to access financial support, especially for DSA. Part time students can only access DSA if they are studying a minimum of 50% of the equivalent to do it full time (or a minimum of 60 credits if studying at the Open University). Students who have the most complex and fluctuating health conditions and impairments may be required to study less than 50% of the full time equivalent (FTE) and yet could present with much higher educational support needs, so could benefit the most from being able to access DSA. However Scottish Government colleagues have told me that the rationale for this policy is due to limits that must be imposed on the number of years a student can receive DSA funding, as the pot is not finite and that ultimately it is the institution's duty under the Equality Act to provide and pay for reasonable adjustments. In reality, the process a student has to go through to try and access the same support/equipment that a student in receipt of DSA would be entitled to is long, complex, arduous and can be futile, reducing a student's capacity to advocate and enjoy their rights as a disabled person under the legislation. If a disabled student studying 50% FTE or more does not have to go through this process to access the funds and support they need then the rationale to expect a disabled student with potentially more barriers to do so makes little sense. Additionally, the argument that it is the institution's responsibility to provide reasonable adjustments could be applied to all disabled students and yet it is only being used as a rationale for those not eligible for DSA. While we understand there is not an unlimited amount of funding, it needs to be distributed based on need rather than how long it takes someone to complete a course, especially as specialist equipment/software may only need to be bought once for the entire duration of the course. DSA should be available to support disabled people to take up learning to help lift them out of poverty and reduce reliance on welfare benefits and health and social care support.

For example, we have been supporting one distance learning disabled student for over a year on the helpline to complain about the lack of an appropriate needs assessment, support plan and reasonable adjustments to reduce the level of inequality and barriers they experience due to their complex and fluctuating health condition. They were not entitled to DSA due to not studying the minimum

level of credits, however they were doing less credits due to the huge strain studying put on their health. This student acquired a health condition in their final year and up until then had been a high performing and successful student. However, because they were not entitled to DSA, they did not get a needs assessment and were unaware of what type of support, equipment and adjustments might have helped them. They repeatedly asked their tutors and the student support team for help, but beyond asking students to apply for DSA, the institution seemed to have very little understanding of what their duties were under the Equality Act. This student has had to repeat their last module three times now due to not being able to cope with the demand or the added strain on their health engaging with the complaints and appeals procedure has caused. This is their last attempt at completion, yet had they been entitled to DSA three years ago they may well have graduated and be in a positive post-graduate destination by now. Instead they have had to defer for a year to recover due to the impact complaining has had on their health, claim benefits, was forced to become homeless and move house and now have higher reliance on the local authority health and social care board for support. This student's institution has eventually agreed to carry out a needs assessment but there is so far no guarantee that the recommendations will be implemented or paid for by them.

This example evidences the need for a review and equality impact assessment of the eligibility criteria for DSA, as preventing disabled students with the most complex and fluctuating conditions who cannot manage 50% FTE from claiming the allowance seems completely counter-productive in giving those students the best chance of success. Additionally, if students are expected to engage with their institutions to try and advocate for their rights under the Equality Act, they need free access to independent legal expertise and advocacy to do so as student representatives are not always best placed to fulfil this role as they may lack capacity or the specific knowledge required to advise on complex equality legislation and discrimination cases.

Another concern we have about part time funding available to students, is the lack of any maintenance bursaries/grants/loans and expectation that people will support themselves/supplement their income through work or via benefits. Not all disabled people or those with long term health conditions are able to work and study at the same time and they may not be eligible to apply for benefits. Due to welfare reform and the design of the work capability assessments, a disabled part time student may not be able to claim ESA/the equivalent in Universal Credit, and may instead be expected to look and be available for work at any time. There is no guarantee that a studying schedule/class timetable can fit in with these requirements but the DWP enforce these rules as a priority over studying commitments. One helpline caller was asked to drop down to part time study by their course tutor due to their level of absence and difficulty to keep up with the work, however they then experienced a huge drop in income as they were no longer entitled to a bursary or loan but they were also not eligible to make a claim for health related benefits and were unable to keep up the commitments of claiming Job Seekers Allowance instead. We would therefore welcome a review of the funding available to part time students and how the current level of financial support may discourage some disabled people from taking up part time learning opportunities.

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

> **We receive multiple calls on our helpline from prospective students in receipt of benefits. The transition from benefits to student funding can be a major barrier for some people due to both the reduction of income, but also the potential loss of income for the period in between benefits stopping and student income starting. We recommend making bridging/transition payments available to these students in advance of starting on a course. We also recommend payments be paid on a more regular/monthly basis to help students budget and to mimic the new Universal Credit payment schedule. Some helpline callers have commented they cannot keep track of their payment schedules and find the information provided difficult to access. We would welcome an approach that utilises digital technology and gives students more control over their student income by being able to log in to an account, view all their student income, payment schedules and any other relevant information.**

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?

> **Accessible information on the full range of student financial support at all learning levels including fees, living cost grants, bursaries and loans, hardship/discretionary funding, travel, childcare, additional grants for carers, care leavers, disabled people, charitable trust funding – and how all of this interacts/impacts on benefits would be helpful. People should also be signposted at the point of contact/engagement to any agencies/services that can provide support/information/advice around student funding and managing finances and debt.**
>
> **At the moment, there is no publically national available helpline/website for prospective students to call so they have to go from source to source, trying to pull all of the information together to make sense of it. Child Poverty Action Group Scotland's helpline and book/factsheets on benefits for student's in Scotland is excellent, but it's only open to advisors as 2nd tier level advice, so members of the public cannot access it directly. We often receive calls from non-disabled people who have found our helpline by googling certain key words and we respond to these calls as best we can, as there is not always an appropriate national helpline service we can signpost to if these callers have not yet decided what/where they want to study.**

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

> **As a pan-impairment charity supporting disabled people to access learning, we would like to see accessible information being produced in a range of formats to meet a variety of communication needs. The Scottish Accessible Information Forum (SAIF) and the Inclusive Communication Hub can provide a range of**

information, advice and training to ensure any information about student funding is produced in a wide range of accessible formats. At the moment the SAAS website is difficult to navigate, it does not flow naturally and it is not always fully accessible for a range of impairment types. The forms and guides can be difficult to find and the information within them can be complex to understand. Information in accessible factsheets, HTML web pages, PDF's, PowerPoints, captioned videos, BSL videos and Easy Read would all be useful.

It would be useful to set up an accessible Scottish student funding website that acts as a one stop shop for any prospective or current students looking to find out more information about student finance. We receive multiple calls on our helpline from prospective students looking for information about funding because they have not managed to find the SAAS website or can't find the information they need on it or they haven't come across the Scottish Government booklet on student funding, or they have not picked a course yet so they haven't thought to look at the institution's own student funding guides.

It would make sense to link guides/websites on student funding from the college/university pages describing available courses. This is often the first thing people look for when considering going to college or university, but it can be difficult to work out from these pages what the course fees are, whether they will be liable to pay fees and what specific student income they will be eligible for to cover living costs and any other additional needs. The website Turn2Us has a very helpful and widely used benefits calculator that allows people to answer straight forward questions about their circumstances in order to receive an estimate of what benefits they would be entitled to and a calculation of how much. It would be great to see something similar being produced for students, which can also take account of benefit entitlement. At the moment the Turn2Us calculator cannot take account of student income due to the complexity of the system and how poorly it interacts with the benefits system.

It would also be good to see increased outreach work with local charities and agencies supporting people who are no longer in school, but who may have aspirations to return to education. We often hear from adult returners that they know very little about student funding and wouldn't know where to start, because they've been out of the system for so long. We deliver ad hoc information sessions to disabled people in the community about accessing education, how funding works and support for disabled people to learn, however we have very limited capacity and resources to do this on regular basis and large scale. There are potentially thousands of people in Scotland who would love to learn something new, whether it be for leisure/wellbeing or to improve their job prospects, but fears about benefits being impacted and lack of information about entitlement to fees and funding are major barriers to enabling people to feel confident about taking the next step. People we speak to on the helpline (often disabled adult returners) are often amazed when we inform them that tuition fees are likely to be free for them and that there is additional financial support available depending on their circumstances.

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

For young people this should happen at school according to their expected school

leaving date. Skills Development Scotland Career Coaches and guidance/personal tutors can talk to them at the appropriate point and tailor the information depending on their circumstances.

Additionally, as previously mentioned, people should be signposted to appropriate information about fees and funding as soon as they look at a prospectus or go onto a course page online. Course pages should provide clearer information about how much tuition fees are with appropriate links to help people work out what fees they would be charged and whether they would have to pay them.

We receive multiple calls on the helpline from disabled students facing long delays with accessing DSA when they start their course. This is often because they were not aware of it until they started their course, only experience barriers to learning after they start or didn't think they would be entitled to it as they don't necessarily consider themselves to be disabled. The delays are amplified by long waiting lists at the start of term to see a Student Disability Advisor as we have heard from professionals across the sector that most institutions' disability services are hugely underfunded with little ongoing investment. Therefore most colleges and universities have a small handful of staff working in disability services so their caseloads are high and their waiting times are long.

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

See previous answers

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

Outreach to parent/carer/guardian groups and forums like the [National Parent Forum Scotland](#), utilising digital technology to communicate with them from schools, running information sessions at schools and carer and family centres.

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

Make the information clearer and available earlier in a prospective student's enquiry journey. People apply for the loan via SAAS but they then have to go to a completely different organisation/website to get any detailed information about student loans, and the information about it on the SAAS website is hidden in a guide to funding rather than being clear on an obvious website page about loans. On the Student Loans Company website, you have to click on five different links before you can find out any information about repayment and the website itself is incredibly complex with vast amounts of information. Case studies and videos of

graduates explaining how it works would be useful and a clear section on SAAS' website about student loans would also help.

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

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

Yes absolutely, students can face the same living costs as non-students and can experience similar financial barriers and complex circumstances. Therefore the rationale to provide a package of financial support that is less than what a non-student is expected to live on makes little sense and actively discourages people to take up a learning opportunity which could lead to a higher earning capacity.

4.2 What should the 'minimum income' guarantee be, and why?

This should be guided by what current research in the UK suggests is the minimum income to live on, for example from the <u>Centre for Research in Social Policy's minimum income calculator</u>, taking into account individual household and family circumstances, entitlement to benefits and regional adjustments. As previously stated, there is no clear rationale to expect students to be able to survive on considerably less money than non-students. While some students can supplement their studies with paid work, this simply isn't possible for all students, especially those who have caring responsibilities, children or fluctuating health conditions that impact on their ability to work and study at the same time.

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

There should be a minimum income guarantee for all students. This should take into account parental and partner/household income/contributions, capacity to take up part time work and entitlement to benefits.

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

This should be guided by individual circumstances and the student funding system adjusted to allow people to maximise their benefit entitlement to ensure they do not experience a loss of income or forced to take out loans unnecessarily when the social security system could be supporting them instead.

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)?

> **Yes, the student funding system should offer increased bursary payments with the option of topping up with student loans to bring their income in line with the minimum income guarantee, regardless of what level of study they are undertaking.**

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.

> **Just to re-iterate my previous comments, I believe a national student information service should exist with a helpline number, email enquiry facility and online enquiry form as well as a website/social media accunts with clear accessible information in a range of formats and a student income calculator to allow potential students to have a clear understanding of what their income will be once they start studying.**