The Modernisation of Disabled Students' Allowances, 2014-2018.

Help or hindrance to Inclusive Teaching and Learning?

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Abstract

This research explores the question, "How and to what extent did the Modernisation of DSAs, 2014-2018, help or hinder Inclusive Teaching and Learning in English HEPs?"

Six mixed method, semi-structured questionnaire studies were conducted over three academic years with respondents supporting disabled students as: diagnostic assessors for Specific Learning Difficulties (SpLDs), study skills support tutors, disability advisers, specialist mentors, and managers and heads of disability services. Respondents were both employed or under contract to HEPs, or authorised independent 3rd parties. Respondents also included HEPs' project managers creating more inclusive teaching and learning (ITL) environments. Additionally, two Freedom of Information Requests (FOIR) were sent to all English HEPs. Three further FOIRs were sent to bodies responsible for regulating and funding English HE and its disabled students.

The literature revealed 20+ years of international and UK efforts identifying, defining and operationalising ITL within Widening Participation (WP) activities, in parallel with a philosophical move away from an individualised model of disability to a social model. The literature also revealed that DSA support existed as co-curricular to rather than integrated with ITL environments.

Results showed the Modernisation caused disruption in day-to-day delivery of DSA support and impeded progress to integrated ITL environments. Sector-wide definition of and progress to ITL environments was inconsistent in breadth and depth, teaching academics' professional education lacked content regarding operationalising ITL in daily practice. Most HEPs spent little money in improving ITL for their disabled students, notwithstanding Government funding provided and recommended for that purpose.

This research recommends establishing an *Institute for Inclusive Teaching and Learning* (IITL), to lead the sector in: defining ITL, encouraging inter-HE organisation collaboration to achieve its operationalisation through Whole Institution (WI) and whole-sector initiatives, formulating and promoting its objective transparent measurement, and integrating DSA within it.

I declare that the work in this thesis was carried out in accordance with the regulations of the University of Gloucestershire and is original except where indicated by specific reference in the text. No part of the thesis has been submitted as part of any other academic award. The thesis has not been presented to any other education institution in the United Kingdom or overseas.

Any views expressed in the thesis are those of the author and in no way represent those of the University.

Signed: Ivan Newman   Date: August 31st, 2020

Contents

1. Foreword

When US President John Kennedy stated (1961) "this nation should commit itself to achieving the goal…of landing a man on the Moon and returning him safely to the Earth" he unwittingly sparked my lifetime interest in things engineering, projects and their achievement. I marvelled at the way physical items were brought together to achieve a specified goal and fascinated by the project's "How?" – the causality of success, or failure!

Some years after graduating, whilst working on information technology projects I read an unusual book. S*oul of the New Machine* told not of technology nor the functional side of running a project, rather it related personal stories of commitment, sacrifice and an atmosphere of ingenuity in the development of a new computer hardware system in a highly competitive and time-limited environment (Kidder, 1981). I was fascinated by the power of stories to reveal lived experience. Later that decade, now managing my own projects, albeit significantly smaller than a moon landing, I found they did not always go as planned, as is their nature. Fortuitously I discovered the business methodology of Problem Analysis (PA) and Potential Problem Analysis (PPA) which helped me get them back on track; it quickly became part of my everyday 'toolkit', giving me the "How?" of understanding the problem and therefore the potential to find solutions (Kepner & Tregoe, 1981, 1997). Indeed, this desire to solve problems meant that clues had to be followed, which fed my love of 'whodunnit' novels. Parenthetically, PA had been used to understand Apollo 13's near fatal mission problems (Kepner & Tregoe, 1981, 1997, pp. 64-67). At the Millennium and beyond, I needed innovative approaches to bring my projects to fruition, but to do so required breaking with traditional ways, in Kuhn's (1962/2012) terminology, I needed to facilitate paradigm shifts to new ways of thinking. When I moved from managing corporate projects into supporting Higher Education (HE) students with Specific Learning Difficulties (SpLDs) I was pleased to be able to apply problem-solving to help them achieve their academic potential. These experiences and ideas are the composite 'voice' which I hope adds value to this endeavour.

This research would not have been possible without my HE colleagues giving most generously of their time, professional associations accepting my proposals for journal articles and conference papers, co-authors and co-presenters for jointly pursuing our mutual goals, my family members acting as patient sounding boards, Professor Louise Manning and supervisors Drs John Conway and David Bozward for their professional insights. Additionally, I thank the many students for whom I have provided NMH support, your determination to succeed has been inspirational. My thanks to you all.

During this research we celebrated the 50th anniversary of the US moon landing. Although HE is not an international moon race, for many disabled students reaching their academic potential given the barriers erected by society in general and the nature of their studies in particular can seem just as difficult and distant a goal. This research is dedicated to helping them achieve their personal "giant leap" (Armstrong/NASA, 2019).

Ivan Newman

2. Introduction

2.1.   Modernisation of DSAs Announcement

In April 2014, UK Universities' and Science Minister, David Willets, announced the Modernisation of Disabled Students' Allowances (DSA) in England[1], setting in motion substantial changes aimed at addressing costs of DSA, which had grown from £92 to 125m between AY2008/09-AY2011/12 (BIS, 2014a). It sought to "rebalance accountabilities…between Government funding and institutional support" Fully implemented, savings of £24.5m pa were expected (Hubble & Bolton, 2016, p. 10). Higher Education Providers (HEPs) were expected, within 15 months, to:

1. "[P]lay their role in supporting students with mild difficulties as part of their duties to provide reasonable adjustments under the Equality Act [and its] anticipatory duties",
2. "Introduce changes which can further reduce reliance on DSAs",
3. "Give greater consideration to the delivery of their courses and how to provide support. The need for some Non-Medical Help (NMH) may be removed through different ways of delivering courses and information"

The interplay between Higher Education Providers' (HEP) course delivery, making reasonable adjustments and the place of DSAs was conceptualised by Shillcock and Underwood, (2015), Figure 1. Inclusive teaching and learning would address most issues related to disabled students, where difficulties remained HEPs would be expected to put reasonable adjustments in place. Where both failed to address disabled students' issues DSAs would 'step in' to help resolve them.

Figure 1: A model for supporting disabled students in HE [adapted from] (Shillcock & Underwood, 2015)
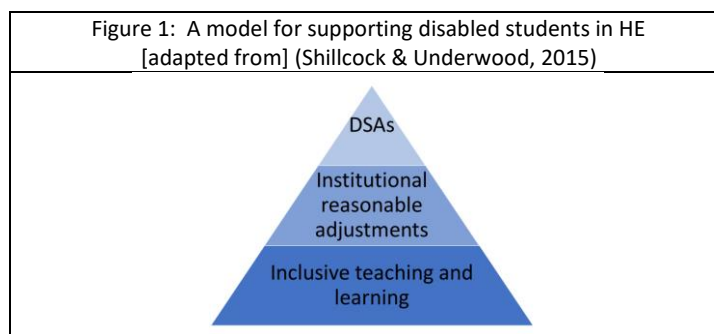
Assuming this hierarchy to reflect the Modernisation's intent, it contained at least three implicit weaknesses. It pre-supposed that all HEPs would be able to deliver Inclusive Teaching and Learning (ITL) of a particular quality to meet students' diverse needs, it retained the idea of 'failure' before reasonable adjustments would be granted and, should those adjustments not resolve students' difficulties, of DSA being applied for and granted. Each 'failure' cycle would necessarily take time to implement, during which students' difficulties continued, to the detriment of their academic performance. No suggestions

[1] HE is a devolved matter in Scotland, Wales and Northern Ireland.

were made by the Department for Education (DfE) as to how these three elements could in practice be operationalised to form a coherent, integrated, timely and effective process as viewed by student recipients.

Responding to sector concern, within 6 months most changes were postponed to AY2016/17 by the subsequent Universities' Minister "to give [HEPs] more time to prepare" and a Consultation launched (Hubble & Bolton, 2016, p. 4); (BIS, 2015a). However, disabled students were required to pay the first £200 for a recommended computer from AY2015/16, reflecting Government thinking that DSAs did not recognise general increases in computer usage (Hubble & Bolton, 2016, p. 11). An initial Equality Analysis concluded that "students that receive DSAs and are from lower socioeconomic backgrounds [were] more likely to be mature and from a minority ethnic background and could therefore be more affected than other groups of students" (BIS, 2014c, p. 49). A second Equality Analysis consultation (BIS, 2015d), sought sector input regarding changes to NMH support's four bands[2], accommodation, and peripheral equipment and consumables. A significantly changed proposal was announced in December 2015 by then Universities' Minister, Jo Johnson (BIS, 2015c). DSAs retained funding for NMH support Bands 3 and 4, printing and scanning, the two lower bands reverted to HEPs (Hubble & Bolton, 2016, p. 12). The announcement urged HEPs to develop more environments incorporating greater ITL and, through reasonable individual adjustments, discharge their Equality Act (2010) Public Sector Equality Duty (PSED). Additionally, a new Quality Assurance Framework (QAF) implemented by the Disabled Students' Allowances Quality Assurance Group (DSA-QAG) would "ensure financial and quality assurance of the provision of non-medical help". Changes to DSAs and the QAF were both operational from AY2016/17, that is, within 9 months.

This research explores the question, "How and to what extent did the Modernisation of DSAs, 2014-2018, help or hinder ITL in English HEPs?" It examines how the Modernisations' changes to DSAs affected English HEPs and NMH providers, the nature and extent of HEPs' ITL environments and the interplay between both, from the initial announcement, April 2014 and April 2018, when a new regulator for English HE, the Office for Students (OfS) [3] and an organisation to develop English HE, Advance HE[4], were established. DSA-QAG ceased operations in December 2019 (DSA-QAG, 2017b)[5] in anticipation of sector changes in 2020.

Novelty in this research comprises its combined use of pragmatism, abduction, grounded theory and applied systems thinking to synthesise the structural analysis in the Dimensions of Inclusive Teaching and Learning, see S.6.2. A further novelty lies in using Freedom of Information requests to elicit rich data about all English HEPs.

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[2] Band 1: Support Assistants; Band 2: Enhanced Support Assistants; Band 3: Specialist Enabling Support; Band 4: Specialist Access and Learning Facilitators.
[3] Into which HEFCE and OFFA were subsumed.
[4] Into which HEA and ECU were subsumed.
[5] Upon its closure in December 2019 all DSA-QAG's documentation was removed from the internet and was lost. Citations in this research refer to the original documentation, copies of which the researcher holds.

2.2.   Society coming to terms with disability

Until the 1853-1856 Crimean War, society's attitude to discharged soldiers "was a mixture of fear, contempt and neglect", old soldiers "made up the hard core of the Poor Law casual [temporary accommodation] wards" (Gregory, 1994, pp. 93-95). Wide press reporting of that war, 1870s' army reforms and various attempts to support employment for discharged men led to the Soldiers and Sailors Family Association's (SSFA) and the Soldiers and Sailors Help Society's (SHSS), foundation in 1885 and 1899 respectively, their aims included supporting "disablement". Both raised considerable charitable funds, playing active parts during and after the 1899-1902 2nd Boer War. In 1914, Britain entered the [Great] [W]ar with a "tradition that combined minimal state aid for ex-servicemen and their dependents with the action of a range of charitable bodies".

Post-1918, Britain, total population <42 million, was immediately faced with an unprecedented additional number of citizens with physical and mental disabilities directly attributable to their Great War service; ~500,000 seriously maimed including 240,000 serious amputees, 10,000 blinded, 55,000 with serious respiratory illness, 13,000 war-related psychoses, 60,000 with neurasthenia [Post Traumatic Stress Disorder], "the list of war-related disabilities was endless" (Gregory, 1994, p. 52). Additionally, 722,785 British dead meant that 3 million Britons had lost a close relative [parent, sibling, spouse, child]. Some 500,000 pensions were granted to orphans and widows (Gregory, 1994, p. 44). In 1920, 100,000 disabled ex-service-personnel remained unemployed, the Government relied upon employers to provide employment, encouraged by the voluntary King's National Roll scheme which imposed a moral obligation with no sense of compulsion (Kowalsky, 2007). The British Legion (the Legion), established in 1921 with the aim of "[caring] for those who had suffered as a result of service during the First World War" (Royal British Legion, n.d.) campaigned for preferential treatment to "secure the removal of the severely incapacitated or disabled servicemen and women from the ordinary competitive market [in employment]" (Gregory, 1994, p. 55).

However, supporting disabled servicemen through employment was not universally accepted. Influential playwright and political activist George Bernard Shaw wrote, 'Disabled men drag down wages and the standard of work. They should not be employed at all industrially. The duty of the country is perfectly clear. These men were disabled in its service, and should be supported unconditionally" (Gregory, 1994, p. 53). In post-war Britain, its economy transitioning to peacetime, weighed by significant war debt of 136% of GNP in 1918 (The National Archives, n.d.), such publicly-financed largesse was unlikely to happen. The Legion, for one, recognising this, resorted to "a semi-charitable approach of employing disabled servicemen through protected Legion-managed industry, most notably the Poppy Factory" (Gregory, 1994, p. 54). The Ex-Servicemen's Welfare Society, formed in 1919, opened its first "recuperative home" in 1920, specifically to help former servicemen

and women deal with trauma-related mental health problems such as anxiety, depression and post-traumatic stress disorder (PTSD) (Combat Stress, n.d.).

However, from where was the money to come to support the largely voluntary funding of support for disabled service personnel? American Moina Michael, one of many moved by John Macrae's now famous poem *In Flanders Fields* (McCrea, 1915) persuaded American ex-servicemen to adopt the poppy as their emblem. In time for Armistice Day 1921, Mme Guerin, who had organised the production of poppies by war widows in the devasted areas of northern France for the benefit of La Ligue Américaine Française des Enfants, supporting French children orphaned and left destitute by the war, persuaded The Legion to use them for fundraising (Saunders, 2013, pp. 105-106). A million were imported and sold, raising £106,000 [worth >£3,000,000 in 2019 (National Archives, n.d.)]. In 1922, keen to support British and Empire severely disabled ex-service personnel, the Disabled Society (later becoming the Poppy Factory) established its own poppy manufacturing factory, wholesaling them to the Legion and similar organisations elsewhere in the British Empire; funds raised supported ex-service personnel and bereaved families (Saunders, 2013, pp. 109-110). The poppy "became an act of support for those who were suffering in the aftermath of war" (Gregory, 1994, pp. 101-103).

Annual poppy appeals required significant organisation, from production, to distribution to mainly female poppy sellers, to collecting the individual sellers' tins to disbursing the funds raised. Even the pricing of poppies was sophisticated. Multiple price points were introduced, with 5 poppy types, designed to be affordable from schoolchildren (priced 1 old penny) to the affluent (priced 2 shillings and sixpence, 30 old pennies, 12½ new pence). Poppy wreaths, for those wishing to spend more, typically to lay on war memorials, were available, by 1929 nearly 500,000 were sold.

The Great War gave rise to numerous charities supporting those affected by war in general and particularly those disabled by war. Their work continued post 2nd World War and numerous still exist today. For example, the Legion, renamed the Royal British Legion, is still instrumental in the annual Poppy Day appeal, the Ex-Servicemen's Welfare Society, now Combat Stress, continues supporting those with Post Traumatic Stress Disorder (PTSD) (Combat Stress, n.d.) and the Save the Children Fund, originally conceived to relieve the widespread 1921 famine across the continental combatant nations, has developed into a world-wide charity helping support services where children are deprived of an adequate education (Save the Children Fund, n.d.). The Soldiers' and Sailors' Family Association (SSFA), Soldiers', Sailors' and Airmans' Family Association (SSAFA) since 1918, supports both serving and former services personnel and their families, including those disabled through their service (SSAFA, n.d.).

A common factor of these organisations is that they existed, at least in part, to address the specific needs of individuals, not merely by the provision of funds to support daily living, but by funding the wherewithal for individuals, including disabled, to help support themselves.

In this characteristic, although the funding source is different, charitable not Local or Central Government, their work has some hallmarks of what we now know as the Disabled Students' Allowances to support HE studies, by covering "any extra study-related costs [incurred] due to an impairment, mental health condition, or learning difficulty. It is neither a benefit nor a loan, so it doesn't need repaying" and based on individuals' needs (UCAS, n.d.).

In 1989 Local Authorities, which had historically paid students' maintenance grants [tuition fees and living allowance] became responsible for paying DSAs for sensory and physical impairment, Figure 2 and S.3.3. In 1998, student tuition fees were introduced, funded through loans provided by the Student Loans Company (SLC), these loans also covered living allowances, DSAs continued to be paid by LAs. In 2008/9 DSAs became SLC's responsibility. DSAs, together with Access To Work (DWP, 2016), a scheme originating in 1994 to support people in work with costs over and above the reasonable adjustments their employers were expected to make under the Disability Discrimination Act (1995); Equality Act (2010); (Deaf Law, 2016), provide disabled people both in HE and the workplace with Central Government funding to support them, something unimaginable to disabled Great War veterans.

This is the context for the *Dramatis Personae* of DSAs.

2.3.   Dramatis Personae

DSAs' legislative and administrative context is marked by an extended timeframe from the 1990s, numerous Acts of Parliament and reports, multiple organisations forming then subsequently closing, and interactions between these elements in a continuous state of flux. This section presents that context diagrammatically together with narrative to help elucidate the story which unfolds during this research. Unfortunately, the reference material for this context is not always as academically robust as it might be, especially for some of the older events and where organisations have ceased to exist, nevertheless all can be identified and referenced in some form. Note also that the focus of this research, and therefore this chart, is Higher Education (HE) in England; HE is a devolved matter in Scotland, Wales and Northern Ireland. However, for clarity some mention is made of the other home countries where the bodies or events concern them.

Figure 2 depicts the complex picture of actors and events as three 'swim lanes':

1. ***Disabilities legislation and administration in HE*** captures the development of disabilities legislation and those areas and organisations within the HE-sector's administration which played a part in supporting disabled students,
2. ***HE Legislation*** tracks the various Acts of parliamentary legislation which have governed HE,
3. ***HE Sector Reports and Organisations*** shows key reports which were delivered and organisations which were established to support HE and/or disabled students.

Figure 3 tracks the key dates in the evolution of Modernisation's changes.

These two Figures cover the time of primary concern to this research - April 2014, the date of the initial Modernisation announcement, and March 2018, the formation of the OfS. However, for context, they also refer to prior and subsequent events.

Figure 2: *Dramatis Personae* - legislative and administrative context of DSAs

Timeline of key legislation, reports and sectoral organisations relating to English Higher Education to December 2019

	Pre-1993	1994 -1995	1996 - 1997	1998 -1999	2000 - 2001	2002 - 2003	2004 - 2005	2006 - 2007	2008 - 2009	2010 -2011	2012 -2013	2014 -2015	2016 - 2017	2018 - 2019
Disabilities legislation & administration in HE	DSAs introduced (1989) for sensory + physical impairment. SLC first year of operation (1990) offering student loans.	SFE, SAAS, SFW SFNI (1994) operational. DDA (1995) Outlawed less favourable treatment and failure to make reasonable adjustments.	DSAs (1996) extended to cover SpLDs and mental health conditions.		SENDA (2001) extended DDA provisions to HE. DSA (2001) extended to cover part-time, post-grade, OU and students >50.		DDA (2005) established concept of anticipatory PSED.	DSA-QAG formed to audit assessment services (centres) and equipment suppliers.	SLC (SFE, SFW, SAAS, SFNI) (2009) took over provision of loans and grants (inc. DSA) applications from Local Education Authorities. (LEAs)	Equality Act (2010) consolidated legislation & widened protections.		Modernisat-ion of DSAs announced (4/2014) Most changes postponed by 1 year (9/2014) Changes modified (12/2015)**	DSA-QAG (2016) mandate extended to audit NMH support delivery. DSA changes 2016 came into effect AY2016/17.	DSA-QAG closed end 2019. DfE (2019) considered future of DSAs as part of SLC Tailored Review.
HE Legislation	FE & HE Act (1992) expanded HE sector, established HEFCE to fund English HEPs.			Teaching and HE Act (1998) Introduced student tuition fees. Loans replaced maintenance grants.			HE Act (2004) established OFFA.	Charities Act (2006) led to HEFCE regulating English HEPs in 2010.		HEFCE extended remit (2010) to regulate English HEPs operational.			HE and Research Act (2017) OfS to regulate English HE, TEF to rate HEPs' teaching.	OFFA+HEFCE (2018) subsumed into OfS. OfS becomes (2018) HE regulator.
HE Sector Reports & Organisations			QAA HE (1997) created for quality assurance to English & Welsh HEPs. Dearing Report (1997) endorses Widening Participation by removing barriers.	HEFCE (1999) reported on base-level provision for disabled students.	UUK Report (2001) established ECU to promote staff equality within HE.		HEFCE, UUK, Standing Committee of Principles Report (2004) established HEA to promote HE teaching excellence.	ECU role (2006) expanded to cover HE students plus staff.	HEFCE report (2009) Evaluation of Provision of Support for Disabled Students showed variable levels of support delivered. HE becomes part of BIS (2009)	Hockings (2010) definition of inclusive teaching & learning.		BIS National Strategy for Access and Student Success in HE (2014) published. HEFCE report (2015) Support for Students with SpLDs showed needs not being met.	DSSLG report (2017) Inclusive Teaching as Route to Excellence published. HEFCE report (2017) Models of Support showed patchy progress to inclusive HE environment. HE reverted back to DfE (2016)	UUK report (2017) established Advance HE, HEA+ECU subsumed therein (2018). Commission for Disabled Students (2019) established by OfS, based on DSSLG.

Figure 3: Timeline of evolution of the DSAs' Modernisation programme in English Higher Education 2014-2016

Timeline of evolution of the DSAs' Modernisation programme in English Higher Education 2014-2016

	Mar-Apr 2014	May-Jun 2014	Jul-Aug 2014	Sep-Oct 2014	Nov-Dec 2014	Jan-Feb 2015	Mar-Apr 2015	May-Jun 2015	Jul-Aug 2015	Sep-Oct 2015	Nov-Dec 2015	Jan-Feb 2016	Mar-Apr 2016	Sep 2016
Ministerial Announcements	DSAs' Modernisation programme announced, effective AY2015/16 (Willetts: 4/2014)			DSAs' Modernisation programme effective date postponed to AY2016/17 (Clark: 9/2014)							DSA's Modernisation programme substantially changed, effective date maintained as AY2016/17 (Johnson: 12/2015)			
Consultations & Reports					1st Equality Analysis of DSA's Modernisation programme published (12/2014)				Call for submissions to Consultation into DSAs' Modernisation (7/2015)		2nd Equality Analysis of DSA's Modernisation programme published (12/2015)			
HE Sector	Prior to 2014 NMH Charter (1/2013) published by NADP									BIS sector meetings reviewing QAF & future procurement (10/2015). NADP & others submit "NMH Alternative Scheme" (10/2015)				DSA's Modernisation changes come into effect (9/2016)

2.3.1.   Disabilities legislation and administration in HE (diagram's top lane)

1. **DSAs were introduced** in 1989 for students with physical or sensory impairment (NNAC, 2016) in (Wilson & Martin, 2017),
2. **The Student Loans Company** (SLC) commenced operations in 1990 "owned by four UK banks to provide mortgage-style loans, regulated by the relevant consumer lending acts". Its ownership reverted to the UK Government in 1996 and its remit fully extended to DSAs in 2009/10 when SLC took over responsibility for the end-to-end processing of applications-payments from Local Education Authorities (LEAs) (DfE, 2019, p. 19); (NNAC, 2016); (National Audit Office, 2010),
3. **Student Finance England** (SFE), Student Finance Wales (SFW), Students Award Agency Scotland (SAAS) and Student Finance Northern Ireland (SFNI) became fully operational by 1994 to manage the flow of loans and grants to students in each of the home nations (Student Awards Agency Scotland, 2016),
4. The Disabilities Discrimination Act, (**DDA**, **1995)** outlawed both direct and indirect discrimination, and introduced the concepts of the illegality of less favourable treatment of disabled people and failure to make reasonable adjustments (UK Government, 1995),
5. **DSA eligibility was extended** in 1996 to cover Specific learning Difficulties (SpLDs) and mental health conditions and as a result of the Higher Education Funding Council for England's (HEFCE) report concerning baseline provision for disabled students, DSAs were extended from 2001 to part-time, postgraduate, Open University (OU) and students over 50 (HEFCE, 1999); (NNAC, 2016) in (Wilson & Martin, 2017),
6. In 2001 the provisions and protections of DDA were extended to HE in the Special Educational Needs and Disabilities Act, **SENDA,** (UK Government, 2001),
7. The **Disabilities Discrimination Act** (**DDA, 2005**) laid a special duty on public bodies, including HEPs to promote equality, the PSED which required these bodies, including HEPs to act in anticipation of those interacting with them being, *inter alia*, disabled (UK Government, 2005),
8. In 2006 the **Disabled Students Allowances Quality Assurance Group** (DSA-QAG) was formed to audit assessment services and equipment suppliers, a Quality Assurance Framework was introduced. A proposal to include Non-Medical Help (NMH) suppliers in the audit process was refused (NNAC, 2016),
9. In 2009, the approximately 130 UK local authorities **transferred their administration of student loans and grants to SLC** and constituent parts SFE, SFW, SAAS and SFNI, which is credited with leading to a significant lowering of service provision and much criticism (National Audit Office, 2010),
10. **The Equality Act** (EA, 2010) consolidated or modified prior equality-related legislation and extended protections, for example, to include the idea of discrimination due to unfavourable treatment because of something arising from their disability (Wards Solicitors, 2011),
11. **Modernisation of DSAs** announced by Minister for Universities, Rt Hon David Willetts, (BIS, 2014a), scheduled to come into effect in AY2015/16 (BIS, 2014a) but later postponed to AY2016/17 (BIS, 2015b),

12. The mandate of the **Disabled Students' Allowances Quality Assurance Group** (DSA-QAG) which had previously audited Needs Assessment Centres was extended to include Non-Medical Help Providers in 2016, the first edition of the Quality Assurance Framework for NMH supply was issued (DSA-QAG, 2017b).

The following 2 items occurred post March 2018 and are therefore not discussed in this research but included for completeness:

13. **DSA-QAG announced that it would cease operations** at the end of 2019 due to changes in DfE tendering and award of business processes (DSA-QAG, 2019a)[6],
14. DSAs were announced as part of the **DfE's Tailored Review** of its operations with the possibility of DSAs being paid directly to HEPs according to some formula rather being awarded to students, dependent on their individual needs (DfE, 2019, pp. 22-23). No report issued as at April 2020.

2.3.2. HE legislation (diagram's middle lane)

1. **The Further and Higher Education Act (1992)** significantly expanded the HE sector by "[ending] the binary divide between universities and polytechnics…and [establishing] the new funding councils [e.g. the Higher Education Funding Council for England, HEFCE]" (SEDA, 2013); (UK Government, 1992),
2. **Student tuition fees** were introduced in England in the **Teaching and Higher Education Act (1998)**, students were eligible to apply for loans to pay these from the Student Loans Company (UK Government, 1998). Student loans replaced Local Authority Student Maintenance Grants. The introduction of tuition fees was contentious (politics.co.uk, 2013); (House of Commons, 2018),
3. **The Higher Education Act (2004)** established the role of the Director of Fair Access to Higher Education in England who, through the informally known **Office for Fair Access (OFFA),** required HEPs to create and submit quinquennial Access Plans (UK Government, 2004). Approval of these plans were HEPs' route to charging higher tuition fees above the prevailing basic amount. OFFA saw its role to "[independently] promote and safeguard fair access to higher education for lower income and other under-represented groups following the introduction of higher tuition fees in 2006/07…OFFA closed in March 2018, being subsumed into OfS" (OFFA, 2018a). The Director had the authority to work with HEPs to improve or reject Plans and should the institution be found in breach of its Plan was authorised to recommend withholding funding from the relevant funding council (Institute of Education, 2004),
4. Due to the **Charities Act (2006)**, **HEFCE became English HE's regulator, operational 2010** (HEFCE, 2010),
5. **Office for Students** (BIS, 2015e)**.** In a consultation, Teaching Excellence, Social Mobility and Student Choice (BIS, 2015e) which led to the HE and Research Act (HERA, 2017), the UK Government, fulfilling an election manifesto promise, reiterated a commitment to WP, "[A]nyone with the talent and potential should be able to benefit from HE" (BIS,

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[6] Note: Upon closure DSA-QAG's publications were not saved to a public online archive, the website went "offline" 20/12/19 (DSA-QAG, 2019b).

2015e, p. 13). The route to this and other targets was, *inter alia,* through launching the Teaching Excellence Framework and creating an **Office for Students (OfS)**. HERA established the OfS to regulate English HEPs, subsuming both HEFCE and OFFA upon its establishment in early 2018; the OfS operated the Teaching Excellence Framework (TEF) (OfS, 2018f); (UK Government, 2017a); (OfS, n.d.).

2.3.3.   HE Sector Reports & Organisations (diagram's middle lane)

1. The HE **Quality Assurance Agency** (QAA) was established in **1997** to provide quality assurance to universities and other higher education providers in England and Wales (Russell Group, 2015),

2. The **Dearing Report (1997)** *Higher Education in the Learning Society* endorsed widening participation *inter alia* through the removal of barriers to the entry and progression of disabled students (Dearing, 1997) in (Wilson & Martin, 2017),

3. **HEFCE published its guidelines on base-level provision for disabled students in 1999** which discussed the balance of responsibility between central (DSAs) and institutional funding to support disabled students; the extension of DSA to part-time and post-graduate students was also proposed [enacted in 2001] (Institute of Education, 1999); (HEFCE, 1999) in (Wilson & Martin, 2017),

4. **Universities UK's (UUK) 2001** report established the **Equality Challenge Unit (ECU)** initially to promote equality for staff employed in the higher education sector, a role expanded in 2006 to cover equality and diversity issues for all students (Institute of Physics, n.d.). ECU established two charters:

    a. The Athena SWAN (Senior Women's Academic Network) Charter, promoting women's participation initially in the Science, technology, Engineering, Mathematics and Medicines (STEMM) subjects, (launched at the Institute of Physics in 2005) but later applied across all subjects (Advance HE, n.d.d),

    b. The Race Equality Charter, launched 2016, to improve the representation, progression and success of black and ethnic minority staff and students with HE (Advance HE, 2019); (Ruebain, 2015),

5. The **Higher Education Academy** (HEA) was established in 2004 to "advise on policies and practices that impact on the student experience, support curriculum and pedagogic development and facilitate development and increase the professional standing of all staff in higher education" (HEFCE, 2003). Underlying HEA's work, the UK Professional Services Framework (UKPSF) supported its 4-level Fellowship Scheme (Advance HE, 2011),

6. HE became part of the Department of Business Innovation and Skills (BIS) in 2009 (UK Government, 2009),

7. In **2009** HEFCE published its **Evaluation of Provision and Support for Disabled Students in HE** which identified information about the variability of support for disabled students across English HEPs and recommended equality impact assessments, the implementation of inclusive practice, staff training and focused funding as key areas for development (HEFCE, 2009) in (Wilson & Martin, 2017),

8. A single and consolidated **definition of Inclusive Teaching and Learning** was proposed by Prof Christine Hockings in HEA sponsored research (HEA/Advance HE, 2010b),

9. The **National Strategy for Student Access and Progress in HE**, published by **BIS** in 2014 identified measurement as key to achieving the stated goals whilst emphasising HEPs' autonomy in achieving the goals (BIS, 2014d),

10. **HFECE's 2015 report Support for Students with SpLDs** showed that these students' needs were not being met, specifically that together with students with mental health needs those with SpLDs were "were least likely to feel that their needs had been met" (HEFCE, 2015) in (Wilson & Martin, 2017),

11. Governmental responsibility for **HE reverted to the DfE in 2016,**

12. The creation of **Advance HE** was proposed in 2017 (Universities UK, 2017), becoming operational in 2018, subsuming ECU, HEA and the Leadership Foundation for Higher Education (Advance HE, 2018),

13. **In 2017 HEFCE** published its **Models of Support for Disabled Students** report which suggested that good, if patchy progress was being made towards inclusive [teaching and learning] environments in 2017 (Williams, et al., 2017),

14. **The Disabled Students' Sector Leadership Group (DSSLG)** published *Inclusive Teaching as a Route to Excellence in Higher Education* in **2017** (DSSLG, 2017),

15. **The Office for Students became operational from March 2018,** subsuming HEFCE and OFFA (OfS, 2018f), similarly, Advance HE which subsumed the Higher Education Academy (HEA), Equality Challenge Unit (ECU) and the Leadership Foundation (Advance HE, n.d.b),

The following item occurred post March 2018 and is therefore not discussed in this research but included for completeness:

16. DSSLG was superseded in 2019 by the establishment of the Commission for Disabled Students (OfS, 2019e).

2.3.4.   Evolution of the proposed changes

See Appendix 1, S.7 for the full text of the Ministerial statements announcing the changes and S.6.1 for a discussion of them.

Figure 3 illustrates the following events:

1. **The NMH Charter published** (NADP, 2013). The work was sector-led through widespread consultation between 2009-2011 by >100 representatives from HEPs, FEPs and NMH providers. Drafts were discussed at the NADP's 2011 autumn conference (Anon, 2018).

2. **The initial Modernisation announcement** was made by David Willetts in April 2014 (BIS, 2014a).

3. **Postponement of Modernisation:** In September 2014, after a change of Minister and a significant sector response, the Modernisation's introduction was postponed from AY2015/16 to AY 2016/17 and a proposal to withdraw funding for IT equipment was softened (BIS, 2014b). The broad thrust of the proposals remained.

4. **In December 2014, an Equality Analysis** was published providing the rationale for the September postponement and softening (BIS, 2014c).

5. **July 2015 a further Consultation was launched** into the Modernisation and its changes (BIS, 2015a).

6. **BIS roundtable sector meetings (of which two) were held in October 2015** to discuss the QAF as then proposed (Anon, 2018); (DSA-QAG, 2015).

7. **October 2015, the National Association of Disability Practitioners (NADP) and others submit "NMH Alternative Scheme"** as part of the roundtable meetings (Anon, 2018). Correspondence subsequently took place between some attendees and BIS regarding the perceived divergence between the sector led NMH Alternative Scheme and the QAF. In an email dated November 2015, BIS responded that it had used the Charter as a starting point but whilst it "set out overarching principles, [it] didn't include within the document how compliance to those principles would be measured…an area we shall be exploring shortly" (Underwood (for BIS), 2015).

8. **Equality Analysis published** in December 2015, based on the Consultation (BIS, 2015d).

9. **In December 2015, a third Universities Minister made a further statement announcing** (BIS, 2015e) substantially modified Modernisation proposals maintaining the two upper Bands of NMH support (3 and4) whilst removing the two lower ones (1 and 2). Start date was maintained at AY2016/17. The statement announced the introduction of a NMH Quality Assurance Framework (NMH QAF), administered by DSA-QAG (DSA-QAG, 2016a).

This, then, was the complicated, multi-party and quickly evolving milieu into which this research launched in 2015.

## 2.4.	Terminology - a problem solved; an issue identified

### 2.4.1.	A problem solved

Early in the project a problem with terminology arose. The legislative background, the Equality Act (S4, 2010), identified certain groups as 'protected', against whom discrimination, with certain exceptions, was unlawful: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. However, the researcher's experience as an NMH support worker (Specialist Study Skills tutor for students with SpLDs) was that his students did not desire 'protection'. They wanted barriers to their learning removed giving 'achievement equity' with their peers. To the researcher, 'protection' also carried undesirable connotations of the medicalised model of disability, that his students were impaired and therefore needed protecting (Oliver, 1990), see also S3.1. Nor were his students 'subjects' to be examined, see Morgan and Houghton (2011), S.3.4.11 for an example. In the UK context, in the author's experience, such groups were often referred to informally as 'target groups', implying that 'something needed to be done to them' by others, again seeming to perpetuate the medicalised model.

Judge Silberman Abella (1984) who led Canada's *Royal Commission on Equality in Employment* coined the term Employment Equity to identify the needs of four groups which she saw as experiencing inequitable treatment and for whose benefit future legislation to outlaw such practice should be passed: women, native people, disabled persons, and visible minorities. These ultimately became the Equity Groups defined within Canada's Employment Equity Act (1995). Adopting this terminology, Equity Group, in this research but generalised beyond Canada's four groups to accommodate the heterogeneity of HE students' needs, matched the researcher's students' narrative, removed the connotation of the medicalised model and has been adopted in this thesis as equivalent to a protected group and sub-groups therein.

### 2.4.2.	An issue identified

Although adopting the term Equity Group was initially a matter of terminology, as this research progressed it became apparent that individual Equity Groups' needs, their heterogeneity, might not be well understood by HEPs, leaving them inadequately met. This idea of different Equity Groups having different needs, even when expressed using identical language was illustrated during respondent Corrine's interview in Study 3, see S.5.3.3.5.

> "For BAME [Black, Asian, Minority Ethnic] students, in some subjects accessibility means decolonialising the curriculum to include more content written by academics of their ethnicity. But to visually impaired students, accessibility means having all their course materials, textbooks, lecture materials - everything able to be screen read to them. If we don't know their individual specific needs, how can we deliver inclusivity?"

Different Equity Groups' needs and HEPs' response to them surfaced throughout the field stages of this research leading to explicit mechanisms to meet those needs featuring prominently in the concluding Section, specifically S.6.3 and S.6.4.

3. Literature Review

This four-part review takes a chronological approach to reflect the way ideas and practice developed and addresses:

1. The individual and social models of disability,
2. Disabled student support in England under Disabled Students' Allowances,
3. Widening Participation,
4. Inclusive Teaching and Learning, focusing on disabled students with SpLDs.

3.1.   The Individual and Social Models of Disability

Oliver conceptualised the term "individual model of disability" which constructs "the problems that disabled people experience as being a direct consequence of their impairment" and that the purpose of supportive help for individuals is "to adjust the individual to the disabling condition" (Oliver, 1990); (Oliver & Sapey, 2006). Within that construction lay a further concept, that of the "medicalisation" of the individual's impairment, that is, that in some way the impairment could be cured and the individual restored to 'normality' as the consequences of the functional or psychological limitations disappear during the curing process. Oliver argues that it is the medicalisation of impairment which leads to the disabling of the individual and consequent "spawning of a whole range of pseudo-professions in its own image; each one geared to the same aim – the restoration of normality". Although it may be in use, the term 'medical model of disability' was not coined by Oliver, who stated "In short, for me, there is no such thing as the medical model of disability".

He, on behalf of disabled people, of which he counted himself one, rejected the "prescriptions of the 'normalising' society and…professional activities which reinforce[d] it" (Oliver, 1990).

He argued for acceptance of disabled people "as we are, not as society thinks we should be", that society had to change not individuals, through group empowerment, his social model. The genesis of his ideas about the social model of disability lay in the distinction between impairment and disability, succinctly summarised as (Oliver & Sapey, 2006, p. 30):

> "[I]t is society which disables physically impaired people. Disability is something imposed on top of our impairments by the way we are unnecessarily isolated and excluded from full participation in society…we define impairment as lacking part of or all of a limb, or having a defective limb, organism or mechanism of the body; and disability as the disadvantage or restriction of activity caused by contemporary social organisation which takes little or no account of people who have a physical impairment and thus excludes them in the mainstream of social activities" (Union of Physically Impaired Against Segregation, 1976, p. 14).

Oliver talks about the individualised model as the orthodoxy, the paradigm and, borrowing Kuhn's concept, that a paradigm shift is required to move to the social model. Such a move would be facilitated by empowerment through dialogue involving the affected parties, rather than through imposition from above or outside, a concept originating in the USA in the 1970s, "Nothing About Us, Without Us" (Charlton, 2000).

The term 'social model of disability' or 'social model' was used in the Modernisation's announcement (BIS, 2014a) and subsequent announcements, see Appendix 1, S.7, and more widely, however, it seems not always to appear as a defined term, leaving its interpretation open to questions and achievement impossible to assess.

3.2. Support for Higher Education (HE) students with Specific Learning Difficulties (SpLDs) in England under Disabled Students' Allowances (DSAs)

3.2.1. Underlying UK Legislation Regarding Disability & Reasonable Adjustments

The legislation underpinning the concepts of disability and reasonable adjustments comprises:

1. Disability Discrimination Acts (DDA) (1995); (2005)
2. Special Educational Needs and Disabilities Act (SENDA) (2001),
3. Equality Act (EA) (UK Government, 2010).

The DDA (UK Government, 1995) first established that discrimination on the ground of disability in the provision of goods and services, but excluding education, was unlawful by:

- [Giving] less favourable treatment for a reason related to a disabled person's disability, and
- [Failing] to make a "reasonable adjustment" [for that disability].

Disability was defined as "physical or mental impairment [with] a substantial and long-term adverse effect on his ability to carry out normal day-to-day activities". Associated documentation explicitly named dyslexia and dyspraxia, two SpLDs, as qualifying disabilities (UK Government, 1995b, p. 4). The test for whether an impairment was long-term depended upon three criteria:

- [It] has lasted at least 12 months,
- [T]he total period for which it lasts, from the time of the first onset, is likely to be at least 12 months,
- [It] is likely to last for the rest of the life of the person affected.

The DDA placed the onus of proof on the providing organisation to show its actions were not discriminatory. This inverted the normal situation in English law (Hall Ellis, n.d.) where the burden of proof lay with the complainant.

SENDA (2001) brought DDA's principles and definitions into delivering educational services, including tertiary-level, being incorporated into the DDA (1995) as Part IV in 2002 and consolidated into the DDA (2005). SENDA compelled HEPs to establish both the precise nature of a student's disability and make reasonable adjustments, at the earliest opportunity, to ensure disabled students were not at a "substantial disadvantage" as regards time, inconvenience, effort and discomfort. HEPs were also required to ensure they were not treating disabled students "less favourably"; additionally, they were expected to create an enabling, inclusive environment as well as to anticipate the need to accommodate such students (Royal Holloway College, 2010, p. 7). 'Substantial' was defined as "a limitation that goes beyond normal differences in ability, which exist in people" (Royal Holloway College, 2010, p. 4).

The above obligations as they related to HE were broadly carried forward into the Equality Act (2010) with the addition of an explicit Public Sector Equality Duty (PSED), which built upon the Disability Equality Duty introducing an obligation to make anticipatory reasonable adjustments "when making decisions of a strategic nature" (EA, 2010, Ss 1 & 96); The Equality Challenge Unit (ECU) provided explicit guidance:

> "[that Higher Education Providers (HEPs) must plan ahead…[taking] a strategic approach to addressing the barriers that potentially impede disabled students. This will involve institutions putting in place systems that can be activated as appropriate for disabled students, staff and/or visitors. [Additionally] disabled students and staff are entitled to individual reasonable adjustments for specific requirements."
>
> (Equality Challenge Unit, 2010)

ECU highlighted that reasonable adjustments be anticipated and provided for groups as well as individuals. This obligation to groups resurfaced in the 2014 Modernisation announcement and subsequent changes to DSA in the form of the requirement that HEPs create Inclusive Learning Environments (BIS, 2014a); (BIS, 2014b); (BIS, 2015b).

Unlike SENDA (2001), the EA (2010) did not explicitly name particular disabilities, however, Guidance Notes provided examples of specific disabilities and their consequences plus suggestions regarding how they should be addressed, for example the interaction between dyslexia and stress is mentioned in Section B10 (UK Government Office for Disability Issues, 2011, p. 19).

The Equality Act (2010) did not explicitly define "reasonable adjustment" but provided three categories where making one was required to eliminate the discrimination:

> "…where a provision, criterion or practice …puts a disabled person at a substantial disadvantage in…comparison with persons who are not disabled…
> …where a physical feature puts a disabled person at a substantial disadvantage …in comparison with persons who are not disabled…

> …where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage …in comparison with persons who are not disabled…"

Several factors would be considered in adjudging an adjustment's reasonableness (Disability Rights UK, 2015):

- "The effectiveness of making the adjustment…,
- The practicality of the adjustment,
- The financial resources of the education provider…,
- The cost of making the adjustment,
- The availability of grants, loans and other assistance to disabled students, such as DSAs…,
- The extent to which aids and services will be provided to disabled students from other sources,
- Health and safety requirement,
- The relevant interests of other students…"

The PSED was challenged. Where there had been reductions and service removal by public bodies, as defined in the Act, Judicial Reviews were used to test the PSED. Whilst these cases did not relate directly to HEPs, the courts' decisions, the Joint House of Lords and Commons Committee concluded "…[it is] the unequivocal confirmation from the Chair of the Independent Review that in his view the PSED should continue to be legally enforceable." (House of Lords and House of Commons Joint Committee on Human Rights, 2014). Hence, HEPs could not avoid their EA (2010) obligations to disabled students.

3.2.2.   Nature of a Specific Learning Difficulties (SpLDs)

The term SpLD encompasses a range of developmental [not acquired through injury] and lifelong educational difficulties, eg dyslexia, dyspraxia, dyscalculia and attention deficit (hyperactivity) disorder (ADHD/ADD), defined in Appendix 2, S.8 (Jones & Kindersley, 2013). Causality is unknown, but believed to be complex and multi-factorial as is the way they affect individuals, being a "consequence of a complex interaction of multiple risk factors, including genetic influences, cognitive weaknesses and life experiences" which range of characteristics led to the concept of neurodiversity which recognises core cognitive difficulties but acknowledges that they are experienced in multiple and various combinations, leading to different individual outcomes. "Essentially…human beings…are diverse in their cognitive make-up and there is an infinite variety of combinations" (Hulme & Snowling, 2009) in (Jones & Kindersley, 2013, p. 23). This potential 'spectrum' of experienced difficulties leads to the challenge in supporting students with SpLDs, there is no 'one size fits all'.

However, not all accepted the construction of dyslexia, arguing that the term is unhelpful when applied as a blanket to cover a range of more specific educational difficulties (Elliott & Gibbs, 2008); (Elliott & Grigorenko, 2014a); (Elliott & Grigorenko, 2014b). Notwithstanding

dissenting views, the UK legislation, clear about the nature of disabilities and HEPs' anticipatory PSED, was the context within which WP, ITL and the Modernisation of DSAs occurred between 2014-2018.

Awards of DSA for SpLDs depended on a sequence of events depicted in Appendix 3, S.9, a crucial element of which was the diagnostic assessment, which established the presence of a disability and was carried out as follows:

Dyslexia, dyspraxia, dyscalculia and specific language impairment could be assessed and diagnosed by Specialist Assessors and Educational Psychologists, ADHD could be diagnosed by Educational Psychologists and general medical practitioners (GP) (Jones & Kindersley, 2013); (British Psychological Society, 2017). Diagnostic assessors gathered background histories as patterns of difficulty manifest themselves in varying degrees throughout assessees' lifetimes especially their education.

Acceptable tests were mandated and advice about support given by the then Department of Education and Science (DfES, 2005) and were typically based on comparing assessees performance to those of a wider peer population (Jones & Kindersley, 2013, pp. 25-39):

> "Measurements of human characteristics, *when taken from a sufficiently large sample [original emphasis]*, conform to a pattern known as a 'normal distribution'; in order to guide their conclusions, [diagnostic] assessors look for statistically significant differences between certain paired tests, differences which are beyond chance where tests are both reliable and valid.

Plotting test scores was a useful way of illustrating for students the issue of statistically significant difference (>14 standard score points) which might lead to an SpLD diagnosis. Figure 4's upper graphic [y-axis represents assessees standard (normed) score, x-axis represents tests], shows a set of scores where there is no such difference (known colloquially as a 'rolling hills' profile) and therefore no SpLD diagnosis. The lower shows a 'spiky/alpine' profile indicative of an SpLD, when confirmed by the student's history.

Figure 4: Column charts comparing a 'non-SpLD' (rolling hills) score profile to an 'SpLD' (spiky/alpine) score profile (Newman, et al., 2018)
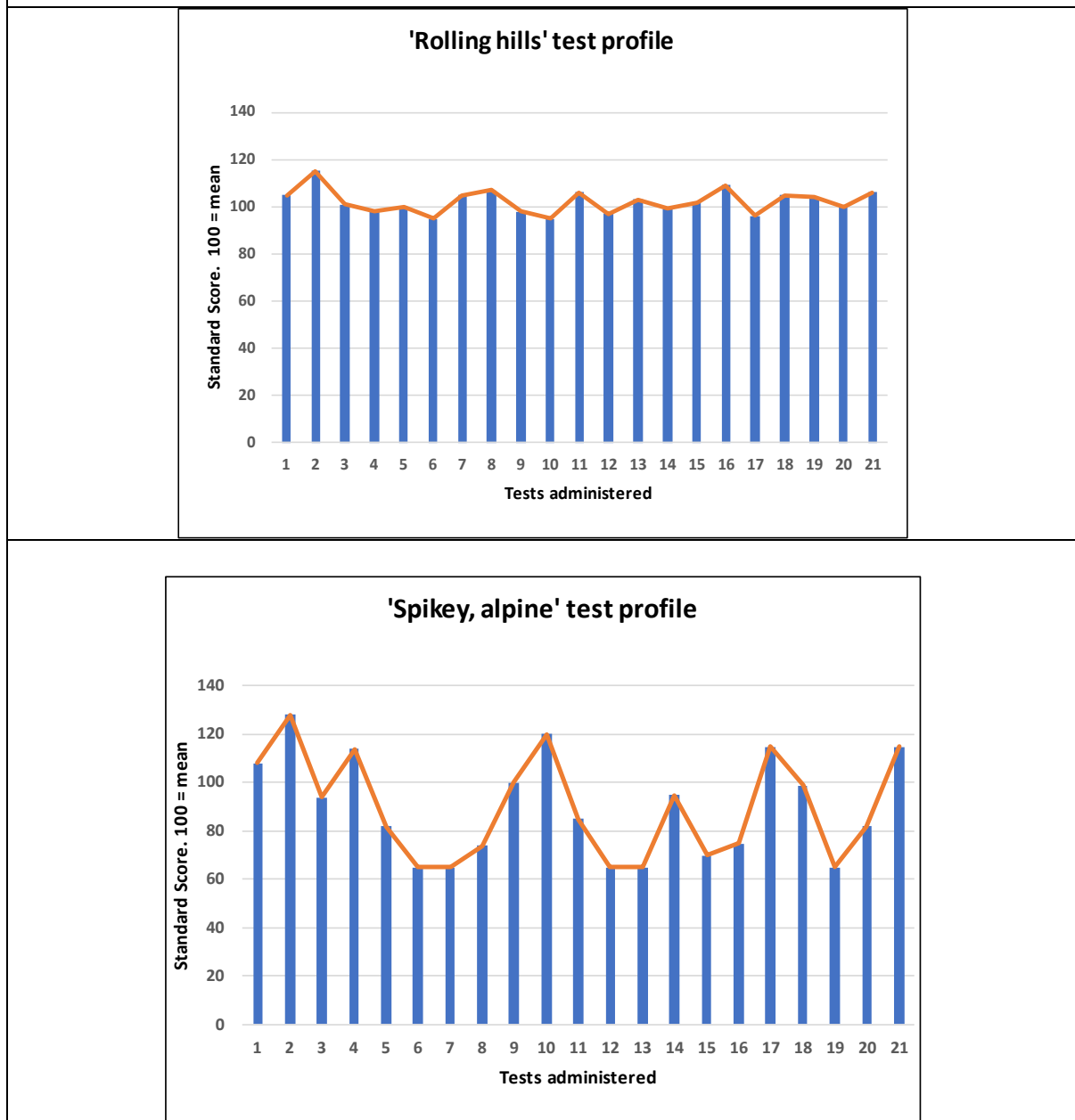
'Rolling hills' test profile

'Spikey, alpine' test profile

SpLDs were the most frequent self-reported disability for all levels of English HE students in AY2017/18 at 38% and 5.2% of undergraduates and dyslexia was the most frequent diagnosis of an SpLD resulting in the award of DSA, however, public domain annual data for dyslexia prevalence were available only upon special request (Williams, et al., 2017, p. 24); (Williams, et al., 2019, p. 7); (HESA, 2019b); (HESA, 2020).

The Rose Report (Rose, 2009) established a definition of dyslexia which is used in primary, secondary and tertiary education in the UK and more widely, eg (Jones & Kindersley, 2013) (BDA, n.d.), see Appendix 2, S.8 for SpLD definitions. The educational consequence of its

difficulties are well established in the literature together with appropriate support strategies (Singleton, et al., 1999); (Morgan & Klein, 2000); (Heaton & Mitchel, 2001); (Mortimore, 2003); (Mortimore & Crozier, 2006); (Kelly & Phillips, 2011). Academic journals, eg the Association of Dyslexia Specialists in Higher Education (ADSHE) Journal of Neurodiversity[7], the National Association of Disability Practitioners (NADP) Journal of Inclusive Practice in Further and Higher Education[8], the Professional Association of Teachers of Students with Specific Learning Difficulties (PATOSS) Bulletin[9], and these organisations' specialist conferences, provided continuously updated ideas for NMH support workers, see next section, to meet disabled students' needs, including those with SpLDs.

3.2.3.   Role of the NMH support worker

During AY2016/17 the Disabled Students' Allowances Quality Assurance Group (DSA-QAG) listed 16 types of NMH support worker roles whose function was to assist students overcome difficulties they were experiencing with their studies by virtue of their disability (DSA-QAG, 2017b), Table 1:

Table 1: Different types of NMH support workers funded under DSA (DSA-QAG, 2017b)
Role name
1. Communication Support Worker
2. Lip speaker
3. Specialist Note Taker (for Deaf/Hard of Hearing students). Includes Electronic Note Taking and Speech to Text Reporter
4. Specialist Notetaker for VI students, including Braille
5. Specialist Transcription Service
6. Mobility Trainer
7. Specialist mentor (mental health condition)
8. Specialist mentor (AS – autistic spectrum)
9. Specialist one-to-one study skills support (SpLD)
10. Specialist one-to-one study skills support (AS – autistic spectrum)
11. BSL interpreter - includes Interpreter for the deaf or Deaf blind People
12. Assistive Technology (AT) trainers
13. Specialist Support Professional for Students with Sensory Impairment – Deaf students
14. Specialist Support Professional for Students with Sensory Impairment – Vision impairment
15. Specialist Support Professional for Students with Sensory Impairment Multi-sensory Impairment (MSI)

These support workers, who would be working for an accredited NMH provider (which could be themselves as 'sole trader' or Limited company) were required to hold certain specified qualifications and/or belong to an accredited professional organisation, and undertake Continuing Professional Development (CPD). They were only allowed to undertake work for which they were qualified. However, this latter stipulation took no account of intersectionality, for example it would be quite possible for a student to have an

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[7] https://adshe.org.uk/journal/
[8] https://nadp-uk.org/resources/publications/published-journals/
[9] https://www.patoss-dyslexia.org/Resources

assessed diagnosis of SpLD as well as Autistic Spectrum Condition, the DSA-QAG Non-Medical Help Quality Assurance Framework (NMH QAF) mandated structure meant that potentially two NMH support workers (SpLD and AS) might be involved supporting a student giving rise to potential issues of conflicting advice, differing styles, potential confusion for the student and extra workload attending two series of support sessions.

Space does not permit an explanation of the way each of the above roles might have supported students, however, a description of the way a specialist one-to-one study skills tutor would have proceeded serves as an example (Klein, 1992)[10]:

1. Identify learning interventions which:
   a. Are relevant to the student,
   b. Give early experience of success,
   c. Enable student to participate and take charge of their own learning to become an independent learner,
2. Assist student to:
   a. Unlearn acquired beliefs or behaviours which hinder learning,
   b. Understand how learning occurs,
   c. Select areas to learn new techniques,
   d. Find learning strategies which work for the student,
   e. Follow the methods in the strategies.

Whilst students receiving such support benefited in their own unique way, dependent upon the specific range of difficulties they experienced, they were all seeking to maximise their performance, reaching towards their academic potential, eg as described in Newman and Conway (2016).

3.2.4.   Models of Support for Disabled Students (Williams, et al., 2017)

In November 2017 Higher Education Funding Council for England (HEFCE) published *Models of Support for Students with Disabilities* (Williams, et al., 2017), the first of a two part evaluation, see also Williams et al. (2019) below. Its aim was "to review the levels of support for disabled students across the higher education (HE) sector in 2016/17 and the progress made by providers towards an inclusive social model of support".

The methodology comprised an online survey of 137 HEPs (105 responses) in receipt of HEFCE Disability Premium, case studies with 13 providers and feedback from 59 individuals in various roles (staff and students).

The report identified and measured eight Key Indicators (findings shown in brackets):

1. Governance, organisational structures, budgets: Existence of written policies regarding (n=105):
   a. Assessment (91%),

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[10] Note: Klein was applying a generalised approach to the specific development of a spelling programme.

    b. Teaching and learning (82%),

    c. Student support (80%),

    d. Accommodation (66%),

    e. Student experience (44%)

    f. Inclusive curriculum design and learning (43%)

2. Inclusive support: 60% rated themselves at 6 or higher (on a scale of 1-10) in terms of inclusiveness, with results suggesting they needed:

    a. Greater staff engagement with training (44%),

    b. Adjustments to estates and technology (38%),

    c. Inclusive assessments (18%),

    d. Inclusive teaching and learning (11%).

3. Assistive technology: 78% used lecture capture (audio or video recording of lectures), but only 20% recorded >50% of lectures.

4. Physical accessibility: 52% had an accessibility plan, and an estate providing:

    a. Almost fully accessible social/recreational space (47%),

    b. Almost fully accessible teaching and learning facilities (38%),

    c. Almost fully accessible accommodation (19%).

5. Disclosure: 88% encouraged disclosure at all (measured) stages of the student lifecycle at:

    a. Pre-application (95%),

    b. Application (96%),

    c. Pre-entry (97%),

    d. Entry/induction (99%),

    e. On-course (95%)

6. Student engagement: 67% engaged with students' unions regarding disability services.

7. Service review: 85% were reviewing/had recently reviewed disabled student support,

8. Impact of disability services: 98% had evaluated the effectiveness/impact of their disabled student support:

    a. Surveying disabled students (91%),

    b. Comparing the academic results of disabled/non-disabled students (84%),

    c. Comparing the satisfaction of disabled/non-disabled students (59%),

    d. Conducting qualitative research with disabled students (54%).

The authors commented that respondents felt they were well organised in providing support and successful in training their staff in supporting disabled students. Similarly, they felt they were doing well regarding inclusive curriculum design and teaching and learning practices, although they sought more support in this area, particularly concerning the robustness of alternative assessments methods and level of buy-in from academics for inclusive curriculum design and delivery. The report identified a source of knowledge about inclusive curriculum design and teaching and learning as Post Graduate Certificates in Higher

Education/Academic Practice, often underpinned by the Higher Education Academy's (HEA) UK Professional Standards Framework (UKPSF) (Williams, et al., 2017).

3.2.4.1.   Discussion

The report occurred during the Modernisation's first year of operation yet there seemed little reference to the changes introduced. The results showed variability in different areas. Encouragement to disclose throughout the student lifecycle appeared well-embedded, whereas HEPs' estates were some way from being fully accessible. There were also some apparent contradictions in the results. There was a relatively low percentage of written policies concerning inclusive curriculum design and learning (43%), yet the report suggests only 11% of respondents needed additional inclusive teaching and learning. This apparent contradiction begs the question, "Without written policies how would over half of respondents assess their level of need?" This issue is further demonstrated by the observation that in most HEPS there was "high variability in their implementation of inclusive teaching and learning approaches" leading to "patchy and inconsistent practice and pockets of good but also poor practice" highlighting the need to "[bring] about cultural change and [get] staff buy-in as they move to greater inclusion" (Williams, et al., 2017, p. 10).

Some of the report's findings were previewed 5 months earlier. Anecdotal reactions to that preview are examined in S.4.4.7.1 as they influenced the course of this research.

3.2.5.   Review of support for disabled students in HE in England (Williams, et al., 2019)

This report, follow-on research to *Models of Support in English HE* (Williams, et al., 2017) investigated progress made between AY2016/17-AY2018/19. Both employed mixed methods.

Overall, this report looks comprehensive and a useful complement to the 2017 report. Unfortunately, participation was significantly lower than in 2017, attributed to the fieldwork survey taking place during the summer break. However, as the research was on behalf of OfS, the sector regulator, low participation could be regarded as surprising. As in 2017, HEPs receiving over £20k of Disabled Students' Premium Funding were invited to participate but only 67 did so compared to 108. Consequently, as the authors explicitly state, apparent changes between the two reports may be explained by respondents' different profiles rather than HEP behavioural or systemic changes (pp. 19-20).

Section 4 (pp. 44-84), Inclusive Provision, whilst possessing useful quantitative information lacked detail and specificity in some areas, potentially suggesting that the researchers or respondents were still thinking about policy formulation rather than at an operationalisation level. However, the cited case study vignettes presented to support the narrative appear to represent useful ideas for operationalisation which possibly suggests that the research lacked questions to evince operationalisation data. For example, the authors usefully

identified "numerous examples of how institutions [were] trying to adopt a more proactive approach" as:

1. Course validation quality processes,
2. Pedagogy - eg group work, large lectures, presentations,
3. Assessment,
4. Technology,
5. Physical and virtual learning environment,
6. Sharing good practice and learning.

Frustratingly, no information was supplied regarding the prevalence of these examples. Similarly, respondents were asked how disability matters were reflected in their Access and Participation Plans (APP) (prior to March 2018 required by OFFA and known as Access Agreements), yielding narrative about drawing on senior-level support, taking a cross-institutional approach, involving the student voice and devising KPIs, useful ideas but again absent an idea of prevalence (pp. 79-80).

The authors identified that all models of support might be imperfect but successful ones shared key features: "strong leadership, holistic approach covering all students, shared responsibility across whole institution, collaboration between core disability services and across all staff groups, balancing inclusive approaches with tailored individual support, giving students a voice" (p. 4). However, such factors as the need for flexible and ongoing staff training and robust validation methods, which might be considered as important indicators, were not included in this list, nor the list of proposed additional indicators (p. 5). Respondents also identified a hunger for sector-wide collaboration. Indeed, in December 2015 SLC raised the hopes of the English HE-sector by suggesting that a collaborative, sharing environment would result from engagement between the Department for Business Innovation and Skills (BIS) and the sector, but this initiative never materialised (BIS, 2015f).

Whole Institution (WI) approaches were widely commended by respondents. However, the report conflated the idea of WI with 'whole of student journey approaches' without providing justification of their equivalence. A further deficiency was the lack of detail regarding sector-wide initiatives supporting the operationalisation of WI, for example Kirkham's description of student participation as an element of WI in Scottish HE, (Kirkham, 2018), or the Australian First Year Experience (FYE) program, see (Kift & Nelson, 2005); (Kift, 2009); (Kift, 2015), below. Potentially, the report's silence in this matter merely reflects the apparent absence of academic literature regarding operationalising WI. Perhaps, also, WI still remains an aspirational goal, rather than a practical one, supporting the idea proposed in this research of creating an organisation whose mission would be to promote such ideas, see S.6.3.

Useful metrics, ie success factors indicative of progress to inclusive support, were identified as HEPs:

1. Having written policies,
2. [Self]-rating on inclusiveness scale,
3. Using audio/video recording of lectures (lecture capture),
4. Possessing a physical accessibility plan,
5. Encouraging student disclosure,
6. Engaging with student's union/guild,
7. Reviewing support functions,
8. Having evaluation methods.

Drivers of change were identified as exogenous rather than endogenous, specifically General Data Processing Regulation (GDPR), OfS's APPs, EU Web Content Accessibility Guidelines, development of Charter Marks, eg Athena SWAN (Advance HE, n.d.c) and 'on-the-ground' developments such as growth in mental health issues within the student body. Some indication was given regarding respondents 'operationalisation approaches, and somewhat surprisingly, the UK Governments Disability Confident employer scheme was also mentioned but no rationale given for its importance to HE (p. 27).

The report made no mention of the effect of the enforcement of the "two-quote" system for NMH provision, see Appendix 4, S.10, on HEPs' models of support. An inconclusive email correspondence with the report's research organisation did not illuminate the matter (Institute for Employment Studies, 2019). However, the report speculated that "a lower proportion of providers had specialist advisers for students with SpLD, which may reflect a reduced need for specialist staff as a result of increased inclusive support for these students" without providing evidence (p. 35). That speculation contrasts with this research's finding which suggests that a number of HEPs disability teams had been subject to downsizing or closure due to the Modernisation which could also account for the reduction in specialist advisors, see S.5.5.

Physical accessibility was briefly discussed, the utility of a WI approach was again identified, an approach exemplified by an 'accessibility checklist' for estates staff, "inclusive provision requires a web of services and staff with awareness, expertise and commitment to ensure not just access but 'dignified' access" (p. 50) and 85% had an accessibility checklist for estates staff (p. 76). No mention was made of a similar checklist for academics regarding inclusive teaching and learning.

The number of HEPs implementing lecture capture was examined and portrayed as an exemplar of good inclusive practice, increasing from 23% to 39% (p. 55) between 2017-2019, which reflects progress. The detail however revealed that 61% recorded fewer than half of lectures, possibly due to 53% of those with the facility reporting that participation was at lecturer discretion Figure 5. The case-study vignette accompanying the results reported that issues of data protection, copyright, privacy and potential negative impact on attendance were used to justify non-usage. Such questions are understandable, but many had overcome them, achieving high levels of recording. The absence of active collaboration

across the sector might have made sharing solutions to such questions more problematic, again highlighting the failure of Student Loans Company's (SLC) December 2015 suggestion that sector collaboration would be promoted (BIS, 2015f).

Figure 5: Proportion of lectures captured 2017 vs 2019 surveys. (2017: n=78; 2019: n=51)
(Williams, et al., 2019, p. 55)

Percentage of respondents recording lectures 2017 *vs* 2019
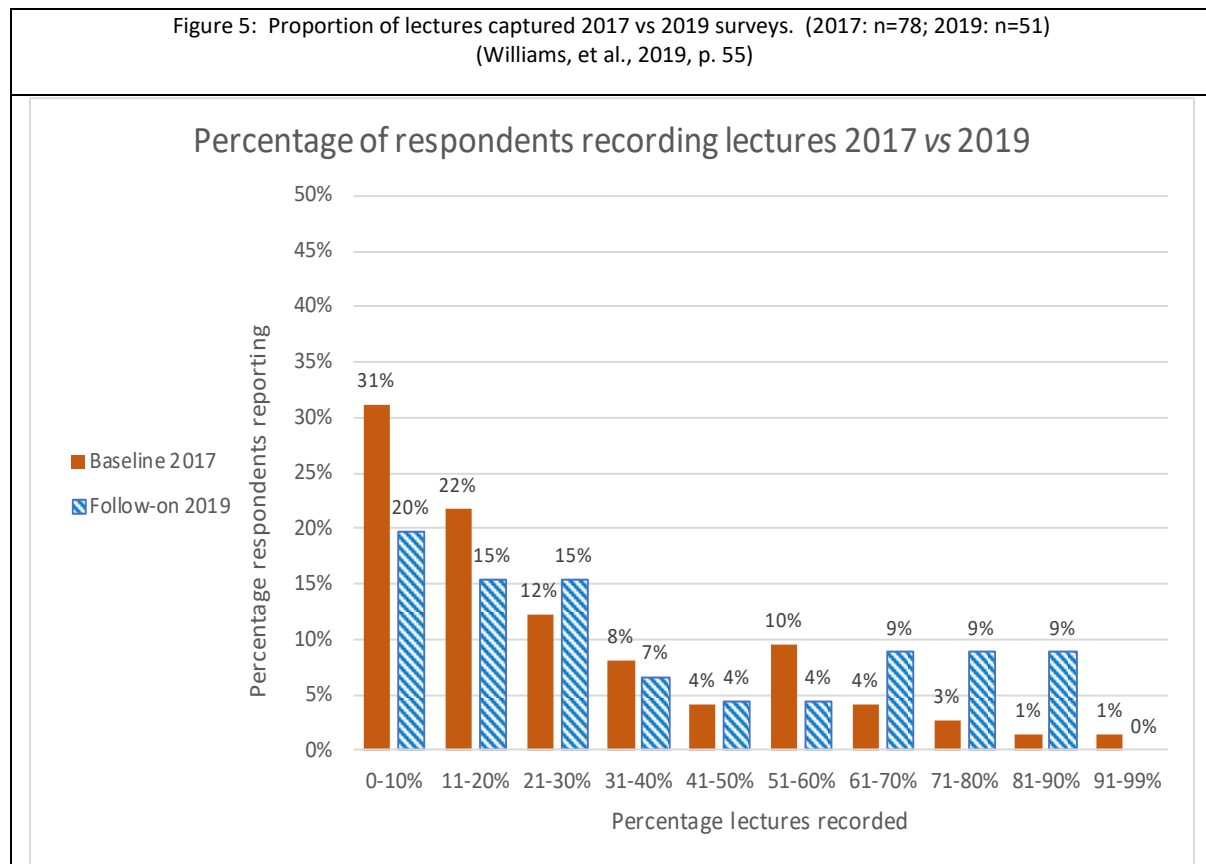
Data regarding the provision of lecture notes revealed only 46% provided them for all (p. 69). The balance variously reported that they would if students' disability support plans required it, others that they would upon request with half replying that it was lecturer's discretion. Hence, respondents' HEPs might be seen at best as inconsistent, at worst practising indirect discrimination.

When questioned about training academics in disability matters, the picture was somewhat mixed and varied little from the 2017 baseline survey (pp. 94-98). Fractionally over half the respondents had trained over 50% of their academics, in fewer than 10% of respondents was that training compulsory. Regarding content, over 90% of respondents provided a mixture of general awareness and specific issues. Training was provided annually in just over 30% of respondents. This research's Freedom of Information Request 2 (FOIR) provided deeper insight into almost all English HEPs' academic training, see S.5.7.

Respondents engaged with their students about support provision in various ways, 93% directly with Student Unions, 88% surveys and 70% focus groups although no comparison with 2017 was given (p. 113). There was some indication that engagement might have been targeted by Equity Group, but none regarding how feedback was used to influence ITL.

Engagement with students and staff evaluating inclusive practice was less common, Table 2. Somewhat frustratingly, the authors gave no indication of which results related to student engagement and which staff.

Table 2: Providers' use of reviews of specific areas related to inclusive practice (multiple response) (Williams, et al., 2019, p. 115) n=53		
Specific area	**Number**	**%**
Inclusive teaching, learning and assessment	27	50.9
Staff training and development needs regarding inclusive practice	22	41.5
Staff training and development needs regarding digital accessibility	15	28.3
Views on and use of lecture capture	27	50.9
Specific technology projects designed to support inclusion	17	32.1
Accessible spaces	22	41.5
Disclosure	9	17.0

In something of a mirror to Table 2, respondents identified the challenges they felt remained in "moving towards a fully inclusive model of support", Table 3

Table 3: Providers' views on what still needs to be done in moving towards a fully inclusive model of support (multiple response) (Williams, et al., 2019, p. 83) n=60		
What remains to be done	**Number**	**%**
Staff engagement with training	51	85.0
Inclusive teaching and learning delivery	48	80.0
Inclusive course/module design/validation	46	76.7
Inclusive assessments	40	66.7
Assistive technology	32	53.3
Funding for training	31	51.7
Adjustments to estates	28	46.7
Use of accessible documents/formats	26	43.3
Executive team buy-in	14	23.3
Other	5	8.3

As in 2017, respondents were asked to self-rate their progress in providing an inclusive model of support, similarly without criteria against which to make that judgement, Figure 6. Between the two surveys the mean increased from 5.67 to 6.16.

Figure 6: How far along do you feel you are in providing an inclusive model of support? (2017: n=98; 2019: n=61) (Williams, et al., 2019, p. 81)
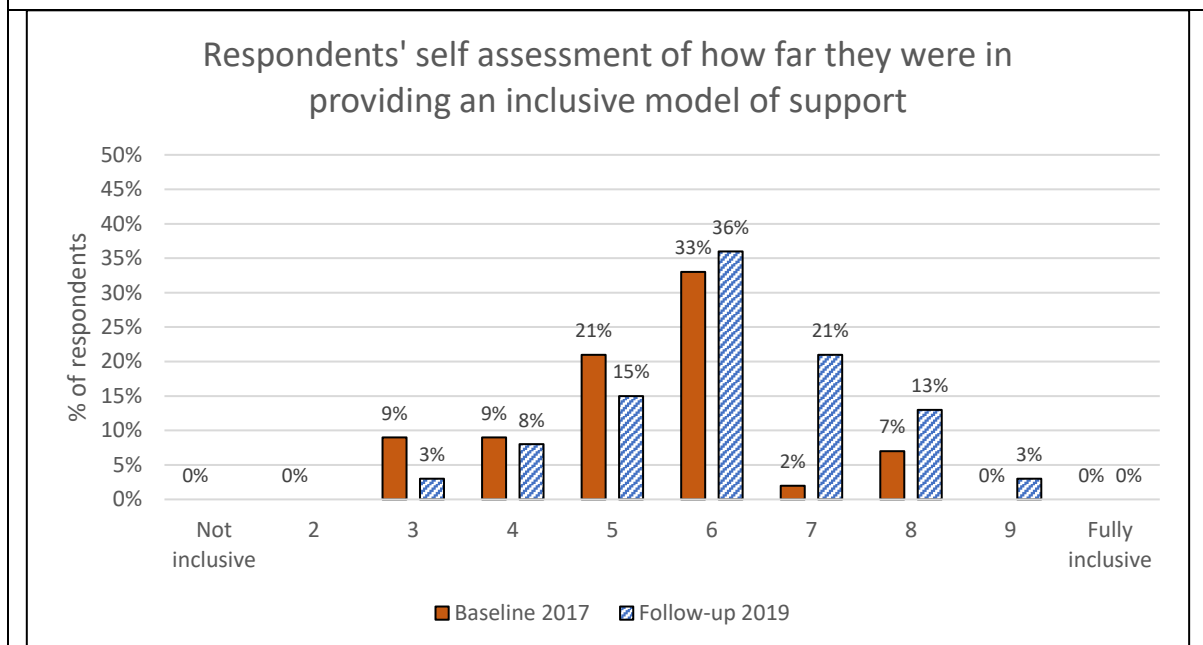
3.2.5.1. Discussion

This report, compared to its 2017 precursor, showed progress had been made in certain aspects of delivering a more inclusive model to meet disabled students' needs. However, self-assessment may be a flawed method of measurement, being "inflated, unreliable, invalid, biased, inaccurate, and generally suspect" regarding abilities, achievements and future outcomes (Yammarino & Atwater, 1993); (Dunning, et al., 2004). Indeed, overestimation of achievement may be correlated to the degree to which the respondent is invested in the subject being investigated, such as HEP staff reporting the results being also engaged in inclusivity initiatives (Johnson, et al., 2018). The report may be further flawed; in many areas it presented quantitative results however, in some it did not, substituting narrative which told of particular practices might be being followed but without providing a sense of those practices' extent across the sector. As with other literature reviewed in this section, a sector-wide lack of definitional clarity and of accepted criteria regarding ITL robbed this report of an ability objectively to measure and report progress towards ITL. Additionally, a significant majority of respondents identified important deliverables of inclusive practices still outstanding. With these gaps it is hard to see how respondents might justify their rating of their HEPs' progress to an inclusive model of support, even if self-assessment of their organisation's progress was a reliable measurement tool.

These areas of vagueness, work still remaining and flawed self-assessment engender a sense of deep unease that either progress is being 'egged up' or that problems are being 'air-brushed' out.

3.2.6. Evaluation of Disabled Students' Allowances (Johnson, et al., 2019)

This DfE commissioned report evaluated the appropriateness of the support model post-Modernisation from AY2016/17. The study aimed to assess the extent to which DSAs were meeting their objective, "to reduce barriers to learning that disabled students might experience…and to explore the impacts of the recent changes to DSA funding".

Qualitative case study visits were made to 8 English HEPs, an online survey was conducted amongst 1,773 disabled HE students at 18 participating HEPs (of the 133 in England (OfS, 2018a)), regardless of their receiving DSA and follow-up interviews conducted with 50 students who had completed the survey. Online survey respondents were asked a common question-set. Answers were then analysed by the year they had first received DSA, 207 respondents prior to AY2016/17, 573 from AY2016/17 onwards. The authors weighted their data, where necessary, using Higher Education Statistics Agency (HESA) statistics to reflect the whole disabled student population's level of study, proportion receiving DSAs, gender, mode of study and HEPs' tariffs. There was no intra-HEP nor inter-HEP comparison. Table 4 presents data drawn from various parts of the report.

Table 4: Comparison between prior to and post implementation of the DSA Modernisation's changes. Abstracted summary of some key results (Johnson, et al., 2019)			
Area of question	**Respondents first receiving DSA pre-Modernisation (before AY2016/17) n=207**	**Respondents first receiving DSA post-Modernisation (from AY2016/17) n=573**	**Difference From AY2016/17 vs before AY2016/17**
Awareness or knowledge of DSAs	62%	56%	Reduction
Satisfaction with ease of getting to the Study Needs Assessment centre	86%	81%	Reduction
Satisfaction with funding entitlement	74%	67%	Reduction
Satisfaction with the amount of NMH to which entitled	70%	70%	No difference
Feeling that their HEP took an inclusive approach to designing and delivering teaching and learning	22%	25%	Increase
DSAs' positive part in influencing decision to go into HE	No explicit figures given		Reduction
Belief that they could have done course without getting support under DSAs	47%	33%	Reduction (statistically significant)
Would not have felt confident in passing their course without support from their HEP	53%	67%	Reduction as question posed in the negative (statistically significant)

These 'before *vs* after' comparisons reveal both reduced and increased outcomes, but only the last two are statistically significant. Post-Modernisation, fewer felt they could have completed their course without DSA support by a statistically significant margin which suggests students' needs were not being met by differences in HEPs' level of inclusivity. Post-Modernisations, for those who had access to their HEPs' support, students reported that they would not have felt confident about completing their course without that support,

again by a statistically significant margin. The authors' data weighting to reflect the disabled student population at large supports the reliability of their findings.

3.2.6.1.   *Discussion*

The report's results, Table 4, appear somewhat less than a 'ringing endorsement' of the Modernised DSAs as "in line with the policy intention, adaptations to provide a more inclusive learning environment are becoming more commonplace and more important in terms of the wider network of support available for disabled students" (p. 13).

An area unclear in the report was the role of HEPs in providing support to students. The Modernisation, through the DSA-QAG QAF, enforced the idea of 3rd part NMH providers delivering NMH support to students independently of their HEP (DSA-QAG, 2017a), see Appendix 4 and S.5.4, S5.5. Nothing in the narrative indicated either an acknowledgement of these two sources of support nor the effect thereof. It is therefore quite possible that the report failed to ask appropriate questions to gain an understanding of the effect of this potential dual source.

3.3.   **Widening Participation (WP)**

WP in HE is the idea of encouraging those, for reasons of socio-economic background, ethnicity, family or personal circumstance who traditionally might have ended their education at secondary to apply for and participate in the tertiary level. Adopted by successive UK Governments since the Kennedy (1997) and Dearing (1997) reports WP policy aimed to rectify certain social groups' under-representation in HE, eg those from lower socio-economic backgrounds and disabled students (Bowes, et al., 2015). Whilst HEFCE had provided significant funding to support WP, typically over £350m pa in three streams, widening access, improving retention and disability, HEPs were encouraged to "set their own WP priorities and use this [HEFCE] funding flexibly in order to achieve their stated aims" (Bowes, et al., 2013a). WP was significantly facilitated by the FE &HE Act (1992) which doubled the number of HEPs within 6 years, see S.2.3, (OfS, 2018a).

This research, and therefore literature regarding WP focuses mainly on the personal circumstance of disability, especially SpLDs.

3.3.1.   **National Working Party on Dyslexia in HE (Singleton, et al., 1999)**

HEFCE formed the National Working Party of Dyslexia in Higher Education in 1994, its goals, regarding the identification (assessment) and support of dyslexic students, were to:

1. Carry out a national survey of policy provision and practice,
2. Identify HEPs' and students concerns,
3. Describe promising practices,
4. Investigate DSAs' operational support,
5. Make recommendations regarding policy and national guidelines for HEPs.

A questionnaire survey circulated to 234 providers offering HE courses, achieved an average 83% response rate, 93% from pre-1992 providers, 94% from post-1992 providers and 77% from FE colleges. Dyslexia occurrence was determined from the Universities and Colleges Admissions Service (UCAS) applications as between 1.2-1.5% of all students. Five regional meetings were convened with providers' representatives, 22 Local Education Authority (LEA) Awards Officers were also consulted [LEAs were responsible for DSA funding until 2008, see S.2.3].

The report proved valuable in the national debate about assessing for and supporting dyslexia in HE, finding, perhaps unsurprisingly, a "marked variability" across HEPs in their institutional efforts and effectiveness regarding dyslexia, and offering costed recommendations in 8 areas:

1. Institutional and national policy,
2. Staff development and awareness,
3. Admission to HE,
4. Identification of students,
5. Evaluation of needs and support provisions,
6. Counselling,
7. Examination and assessment,
8. Careers advice.

The report was the first to address systematically HEPs' response to any disability; its publication broadly coincided with the DDA (1995) coming into force and its extension to HE via SENDA (2001), the context was one of WP and the expectation of more dyslexic students studying in HE. In keeping with contemporary practice, with the idea of "reasonable adjustments" recently enshrined in law, it proposed a mostly, although not exclusively individualised approach, HEPs' were expected to deliver support to dyslexic students through making individual reasonable adjustments. Nevertheless, as suggested by the above list of recommendations, HEPs were expected to move towards a more social model by modifying their policies, procedures, admissions, staff training, assessment and provision counselling (ie study skills support, which later became known as Non-Medical Help (NMH) support) (Oliver, 1990), see S.3.1.

3.3.1.1.   Discussion

The recommendations anticipated a wide-ranging institutional approach to supporting students with dyslexia. However, they did not represent a WI approach, none suggested modifying teaching and learning to make them more inclusive for dyslexic students. This absence reflected an individual, medicalised model of disability, see S.3.1. Nevertheless, the report provided a widely adopted framework for support, remaining broadly unchanged until the 2014 Modernisation.

3.3.2. Incorporating disabled students within an inclusive higher education environment (Fuller, et al., 2004b)

This 18-month study was conducted at a single, 3-campus, small (6,000 undergraduates), largely liberal arts, post-1992 HEP. Respondents presented with a range of impairments often multiple. A questionnaire survey was sent 593 undergraduates who had declared an impairment (~10%). A sample group of 20 were subsequently interviewed. To inform the interviews, participants were provided with the survey findings using multi-representational methods – charts, reading aloud and written. This sample followed four distinct study areas, reflecting differing methods of teaching, learning and assessment, and proportions of disabled students. A £5 incentive was offered for interview participation, often declined or donated to charity.

The authors' literature review identified previously recognised issues regarding the needs and rights of disabled students:
1. Legislation, although necessary, was insufficient to achieve positive support (Maclean & Gannon, 1997),
2. Staff lacked training, knowledge of resources and skills, and familiarity with disability laws (Leyser, et al., 2000),
3. Attitudinal change in staff is harder to achieve than physical adjustments (Beilke & Yssel, 1999).

The research found that students' experiences of teaching appeared somewhat common across disciplines:

1. Approachability of staff: There was variability in staff's approachability and their level of knowledge of learning difficulties,
2. Lectures: These frequently suffered from overfast delivery, visual material removed too quickly, insufficient time to digest content, illegible content even when available beforehand. The same was true of other pedagogical methods, eg seminar, laboratory,
3. Interaction in class or field work: Inappropriate pace of interaction, inaudibility of both staff and students, poor moderation/facilitation,
4. Issues with assessment: Course/module often chosen to avoid/select assessment method, eg when students wanted less written and more practical assessment, assessment which might avoid giving presentations. Inadequate offer of alternative assessment methods. Assessment briefs were insufficiently clear,
5. Non-homogenous group: Whilst individuals could be grouped by the 'label' of their disability(ies), each individual was challenged in a unique way which was not always recognised,
6. Insufficient information: It was difficult for prospective disabled students to make informed choices between providers based on their support needs as little

comparative information existed and/or the providers would not engage with prospective students until they had been awarded a place.

The HEP, a post-1992 institution, had an admissions policy which encouraged the non-traditional learners anticipated by WP. This study, therefore, provided the operationalising bridge between WP policy and the need to support those admitted under it, acting as the foundation for the provider's subsequent inclusion strategy.

3.3.2.1.   *Discussion*

This study provided the, often lacking, students' perspective, their individual and collective daily experience, with five of the six main findings relating to teaching and learning. Notwithstanding this HEP's policy statements, from the students' perspective it was the academics themselves, individually and collectively, who could have most directly mitigated students' difficulties by changing the way they taught and the content of the curriculum. Contrastingly, the sixth finding, that insufficient reliable and comparative information existed upon which student could make informed choices between providers, identified a sector-wide failing, which still exists in 2020, see recommendation in S.6.3.2.

3.3.3.   Managerialism and Equalities: Tensions within widening access policies and practice for disabled students (Riddell, et al., 2007)

This paper evaluated four different university contexts (two pre-1992 and two post-1992 HEPs) as regards ways in which WP was 'playing out' in each, through the twin lenses of managerialist and social justice principles. The authors identified that "New public management has its origins in neo-liberal philosophy, which holds that all human behaviour can and should be measured and in order to achieve efficiency, effectiveness and value for money in the public sector, all activity should be measured against agreed targets" (Clarke & Newman, 1997) and (Deakin, 1994) in (Riddell, et al., 2007, pp. 615-616). The four-year, longitudinal Economic and Social Research Council (ESRC)-funded study addressed four questions:

1. How does policy and practice in relation to disabled students fit alongside other aspects of WP within the institution?
2. What institutional responses are evident in relation to government and funding council requirements for compliance with quality assurance regimes and the extension of the audit culture to the widening access agenda?
3. How do different institutions understand the concept of making reasonable adjustments in teaching and learning?

Interviews were carried out with 28 individuals, spread somewhat unevenly across the HEPs, 10 senior managers, nine senior support staff, two in student services and six actively supporting disabled students.

The study found that only one HEP, post-1992, regarded disabled students as part of its WP agenda, low participation or socially disadvantaged students being the focus of the others' WP. The two pre-1992 HEPs resented WP's quality assurance regime, which mandated targets, viewing it an "unwarranted intrusion" on their autonomy. Regarding adjustments to teaching and assessment, there was little reported about curriculum adjustments, however there was concern regarding adjustments to assessment, both costs and the idea of conferring unfair advantage on disabled students, especially compared to others who may have had difficulty with the course. This latter issue drove one responding HEP to make adjustments for a much wider group. Legislation was seen as having a major impact on HEPs' action in achieving social justice. Local factors seemed to be a major element determining the effect of national policies – HEPs' culture, recent events in their history and the nature of specific departments.

3.3.3.1.   *Discussion*

The study highlights that disabled students can be 'lost' from a WP agenda *vs* other Equity Groups, as suggested by Gale (2009b). The notion that reasonable adjustments can unduly favour disabled students as against their peers may miss the possibility that an 'unadjusted' approach may discriminate against certain types of disability. However, there appears validity in the notion that the sharp cut-off in reasonable adjustments only being available to students with a diagnosed disability might be unfair to those who might also be faced with course difficulties, given the natural variation in a population's abilities (Jones & Kindersley, 2013, pp. 25-39). One HEP's approach of modifying its approach more widely to accommodate issues appears to be a move to greater inclusively in general.

3.3.4.   Towards a Southern Theory of Higher Education in Preparing for tomorrow today: The First Year Experience (FYE) as foundation. First year in Higher Education Conference 2009 (Gale, 2009a)

Gale, drawing on the conception of 'Southern Theory', suggested the "social theory that informs HE…is produced in, and takes the perspective of, the global north [and that] despite claims to universality, these theories are essentially Eurocentric, [failing] to account for voices and knowledge from non-dominant peoples" (Connell, 2007) in (Gale, 2009a, p. 2). Gale used Connell's 'realms of knowledge' to elucidate thinking about equity and social inclusion in HE, identifying the dichotomy between what he considered a failing system too focussed on equity in selection for Australian HE rather than equally on students' experience of it.

In that 'failing' context, equity in Australian HE was seen through the lens of proportional representation of various Equity Groups, primarily: low socio-economic status (SES), indigenous peoples and those living in remote areas; he also noted that students with disabilities "seem to have fallen off the equity agenda" (Gale, 2009b, p. 3). He also observed that terminology might not have been helpful, for example 'low socioeconomic status' appeared to be an "umbrella term for all under-represented groups". He noted that people

from low SES backgrounds were not a homogenous group and that policy which regarded them as such was misguided. He also called into to question the way SES was measured and its granularity, the contemporary granularity was not sufficiently fine to identify wealthy and high-status areas within low SES areas and *vice versa.*

Gale felt that this notion of invisibility within statistical measures might have applied to failure to attract disabled students into HE as individually they were unlikely to be defined by their physical location, such as an area of low SES, because, at least from his anecdotal experience, disability occurred more indiscriminately, to anyone, anywhere and in any social group.

Whilst questioning the definition of what might constitute equity and the appropriate metric, Gale also suggested that such measurement needed to be applied by institution [*vs sector]* and course type (Gale, 2009b, p. 7). He also suggested that as many HEPs within the Australian system drew on geographically defined catchments, targets for equity participation should also be seen in that same light, with success being seen, at least in part, geographically.

Gale decried the fallacious belief held by many academics that enrolment of low SES students into HE required a lowering of "academic entry standards" leading to a subsequent overall lowering of academic achievement standards, but without citing specific studies to support his contention. He also criticised the Tertiary Entry Rank scores used for entry to HE[11], was "an authoritative measure which rewarded the cultural characteristics of the most economically powerful groups in society" and therefore perpetuated that dominance (George, et al., 2005); (Gale, 2009b, p. 8).

He noted that increased support was required for the various Equity Groups to succeed in HE, typically co-curricular activities delivered outside the regular curriculum, eg study skills tuition, mentoring, counselling. The Australian government policy had awarded additional monies to institutions for each low SES student enrolled to improve retention and completion rates, citing A$325m spent in the prior four years, three times as much as outreach aimed at simply enrolling such students. However, the variability in the support needs of students studying at different institutions, the support required by different Equity Groups and the levels and nature of support offered by institutions made causal relationships between support and retention difficult to identify.

Gale felt that there existed two fundamental problems with the conception of the additional support which might be required by Equity Groups. In characterising the first, he supplemented Tinto's (2008) contention that 'access without support is not equity' with the idea that 'opportunity confined to support is not equity' arguing that this latter state of affairs did nothing to challenge what HE might mean, rather it reinforced the prevailing

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[11] The student rating used to select students for entry to Australian university entrance, replaced by the ATAR in 2010 (K12 Academics, n.d.); (University Admissions Centre, 2019)

paradigm hence little of substance would change. Second, he worried that the co-curricular nature of support, as it was "peripheral to the central activity of universities", forced Equity Group students to adjust to the normalising mainstream (Gale, 2009b, p. 9).

In this observation, Gale was perhaps merely observing the individual model *vs* the social model of disability in play in the HE context, that it is the student which needs to be 'fixed' to cope with the institution rather than the institution changing its core deliverable to meet the needs of its diverse students (Oliver, 1990); (Oliver & Sapey, 2006), see also S.3.1

Gale's proposed solution to these problematic issues was to change HE from the centre, for the "equity agenda…to centre on the student learning environment and experience" using three principles from the Southern Theory of HE:

1. All are appreciated for who they are and their identification,
2. Individuals make knowledge contributions to the curriculum at the same time as developing their understanding and skills,
3. All students have the opportunity to shape their own learning (Gale & Densmore, 2000) in (Gale, 2009b, p. 13).

Such change would be radical, requiring the opening of curriculum content to be accessible by all, including Equity Groups, and the repositioning of disciplines and traditions.

Overall, Gale identified that in addressing the needs of Equity Groups:

1. HE policy defined social equity and inclusion in terms of student numbers and whilst this approach was insufficiently nuanced it was politically useful to so do,
2. University support services were largely co-curricular and not part of the mainstream pedagogy,
3. A more sophisticated approach to equity required a change to institutions' core curriculum and pedagogical offering.

This last proposal strongly suggests that WI approaches were required to achieve deep and lasting progress with the radical changes he suggested.

3.3.4.1. *Discussion*

For Gale, the whole HE system needed to 'face up' to the implications of greater diversity in the student cohort. He contended that focussing merely on admissions' equity, whilst politically expedient, disserved students. Further, he felt that in providing Equity Group students with co-curricular support perpetuated the idea that the student not the institution was the problem and that modification of the curriculum by listening to the student voice was the only route to equity.

3.3.5. Review of Widening Participation Strategic Assessments 2009 (Thomas, et al., 2010)

This study examined Widening Participation Strategic Assessments (WPSA) formally requested by HEFCE of 129 HEPs, providing a descriptive overview "of the ways in which institutions…are addressing widening participation and equality" based on a thematic analysis of responses. It neither assessed individual WPSAs, evaluated nor compared different institutional approaches. It found, *inter alia*:

1. Providers thought about WP strategically but with varied commitment levels: WP understanding and delivery were mediated by HEPs' mission, history and location,

2. WP was increasingly linked to other institutional strategies, policies and priorities: 95% linked WP to Access Agreements, 53% linked it to equality & diversity strategy, and 53% to learning, teaching and assessment strategy. These linkages, however, fell far short of WI approaches to WP, an issue Thomas (2017) revisited in a later paper,

3. Three types of organisational culture were identified, the most adopted ones being the latter two, 63%:
   a. Centralised WP team/unit (13%),
   b. WP dispersed or mainstreamed into academic or service functions (37%),
   c. Hybrid arrangements (26%), with shared responsibilities for WP which was coordinated centrally and appears similar to the top-down/bottom up approach identified in Thomas's (2017) WI report,

4. Providers targeted a wide range of WP groups, 98% hoped to attract disabled students, however there was "little evidence in the WPSAs to suggest that institutions [were] taking proactive steps to support disabled students to successfully apply to HE" (p. 9),

5. HEPs were challenged in their choice between a 'holistic' approach of offering retention support *vs* mainstreaming developments to benefit all; the report found limited evidence of strategic links between recruitment, admissions, retention, teaching and learning, and progression (pp. 36-37),

6. Providers were taking a more strategic approach to induction, moving from an event to "recognising it as a process"; some used the induction period to try to…target support at particular student groups, eg Autistic students (p. 10),

7. A growing awareness of the link between WP and learning and teaching, however only 53% explicitly referred to their teaching and learning strategy in their WPSA. Consequences of WP and learning and teaching interactions included the need for (p. 10):
   a. Increased organisational flexibility,
   b. Embedding study skills,
   c. Changes to assessment strategies,
   d. More student-centred learning,
   e. Curriculum development and review,

  f. Renewed emphasis on personal tutoring, especially for those at risk of failing and/or withdrawal.

8. Vague relationships between planned WP and anticipated outcomes, partially due to missing appropriate performance indicators, measures, targets or approaches to measurement. However, >85% of HEPs used HESA's WP related benchmarks, although it was not until AY2013/14 that these included disabled students[12] (p. 11),

9. Evaluation, defined as measuring outcomes or impact were not generally embedded, hence "relationship[s] between objective and planned course of action to achieve it remain[s] untested…" (p. 13).

3.3.5.1. *Discussion*

The researchers found a lack of institutional developments to mainstream and sustain WP and equality:

1. WP was an increasing institutional priority, but senior leadership of WP was not always present,

2. Little explicit evidence existed of systematic approaches to developing an inclusive institution,

3. Some evidence existed that a few institutions were linking WP to learning and teaching and implementing inclusive practices,

4. Many institutions lacked overt statements of their WP definition or institutional vision for it,

5. Under half, 42% (54), identified staff training and development activities to support WP whilst just 17% (22) discussed sharing and promoting good practice across institution,

6. The WPSAs showed that the volume of data HEPs had regarding their WP activities was sufficient but there existed less clarity over policy outcomes and interventions relative to targeted groups (Equity Groups).

HEPs overall appeared better at policymaking than operationalising their policy commitments. As Gale, above, identified in the Australian context there was a clear gap in understanding the implications of WP, that HEPs needed to change their curriculum delivery. Gale was expressing the hope that by so doing diverse cohorts could thrive but did not provide confirmatory evidence of such an outcome. However, see S.3.4.6.1 regarding the adoption by the Australian Government of Equity Groups' completion rates to determine, in part, Australian HEPs' funding.

Lastly, HEPs' lack of definitional clarity around WP could be described as reprehensible for academics, who would be likely to mark down any of their students' failure to define terms! (University of Manchester, n.d.).

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[12] 2019 HESA benchmarks at https://www.hesa.ac.uk/news/07-02-2019/widening-participation-summary

3.3.6. The Uses and Impact of HEFCE Funding for Widening Participation (Bowes, et al., 2013a)

The study invited 205 HE and FE providers receiving >£50k of HEFCE WP funding in AY2011/12 to participate in a survey and follow-up interviews, 104 responded (50.7%) accounting for 73.7% of those monies; interviews were conducted with staff in 31 representative providers. Providers fell into four categories (2013a, pp. 1-2):

1. **Inclusive institutions:** Large, usually teaching-intensive institutions recruiting significant numbers of WP students,
2. **Selective institutions:** Large, usually research-intensive institutions recruiting high-attaining students,
3. **Specialist or professional training institutes:** Smaller HEPs and colleges that offered only a small range of courses, usually dedicated to a particular profession,
4. **Small institutions:** FECs, general colleges and small HEPs that often recruited locally and many of whose students were from disadvantaged groups [Equity Groups].

The two main relevant questions asked were:

1. What [has] the [HEFCE] funding delivered?
2. What evidence [is there] of the impact that the funding has had on institutional and wider WP objectives?

Key findings were (pp. 2-4):

1. The majority possessed a WP strategy, co-ordinated and partially delivered by a dedicated WP unit. Inclusive and small institutions, where a significant proportion of students were identified as WP and WP was regarded as 'core business', typically integrated WP into institutional and/or departmental strategies, sharing implementation responsibilities,
2. Attributing specific HEFCE monies against specific activities challenged the majority,
3. Widening access activities were more targeted than retention activities which latter tended to be embedded into the wider curriculum and support services,
4. Respondents aimed to balance targeting support at the groups which required it most and delivering an inclusive offer designed to treat all students equally,
5. HEFCE funding primarily supported infrastructure developments, staff appointments, outreach activities, curriculum development and student support,
6. Most were not robustly evaluating longer-term impact to develop a coherent understanding of 'what works and why',
7. Most sought further guidance from bodies eg HEFCE/OFFA regarding strategies and approaches for monitoring and evaluating WP activity,
8. Most agreed that effective WP would be achieved only with a coherent and sustained programme of access and retention activities over the entire student lifecycle and integrated across the whole of the learning experience by academic departments' active involvement,

9. Other than through the work of disability services, support was rarely directed at Equity Groups to avoid stigmatisation, rather directed at those at risk of dropping out or underachieving, *inter alia*, with low or unconventional entry qualifications, SpLDs, poor attendance, financial problems (p. 46),

10. Analysis of usage of the HEFCE disability allocation revealed a wide activity range, however, curriculum development and design was reported by only 27% (24 of 89), and as regards WP activities more generally, by 60% (53 of 89), see ***emphasised text*** in Table 5.

11. Regarding using HEFCE disability funding the report concluded (p. 51):

   a. "[O]overall effectiveness is difficult to assess because so much targeted activity is designed to meet the specific needs of only a small number of individuals,

   b. Equality and diversity and WP work in this area often overlaps,

   c. Differentiating the contribution that the HEFCE allocation makes to initiating change from other policy and legal mechanisms, notably the Equality Act 2010, is…challenging."

Table 5: Activities carried out using HEFCE disability funding (Bowes, et al., 2013a, pp. 48-49) n=89		
Activities carried out using HEFCE funding	**Number**	**%**
Additional support for examinations & assessments	64	72%
Staff support & development relating to disability	63	71%
Provision of a dedicated disability support unit	60	67%
Additional admissions support for disabled students	59	66%
NMH helpers for learning and teaching eg note-takers, readers	57	64%
Provision of specialist IT equipment	57	64%
Induction materials for disabled students eg additional guidance	54	61%
Additional pastoral support for disabled students	54	61%
Provision of modified or additional learning tools eg books, course materials	***53***	***60%***
Modifications to buildings or walkways	32	36%
Pre-entry aspiration raising…	31	35%
Curriculum organisation and design work	***24***	***27%***
Support for extra travel costs due to disability	23	26%
General financial support	16	18%
Guaranteed interview schemes or similar	6	7%
Other	1	1%
Don't know	7	8%

3.3.6.1. *Discussion*

1. The four different provider categories varied in the way they approached WP. Inclusive and selective providers regarded WP as an 'add-on' activity, whilst for specialist and small providers WP was an activity core to their business model,

2. Retention activities were more generally delivered to the whole student cohort than access activities due the desire not to stigmatise Equity Groups, the exception being support through disability departments. There was no mention of the notion of

checking that any particular Equity Group's needs were actually met by the whole cohort approach, nor consequent actions of redesign and changed delivery if not,

3. Unravelling the interlinked effects of activities under each funding stream and of external factors, eg legislation, was difficult, HEFCE/OFFA support/advice for monitoring and evaluating WP, both measures and the tools, would have been welcomed but were absent. Without such common tools and metrics clear and uniform information was unavailable to inform students when choosing providers,

4. Coherent, integrated and WI strategies were needed to achieve WP. Such an approach appeared more prevalent in specialist or smaller providers than inclusive and selective ones,

5. Curriculum development activities to meet the needs of WP and disabled students were only reported by 26.9% and 59.6% of respondents, respectively. Inclusive teaching and learning did not appear to be a focus for HEFCE funded activities.

Lack of curriculum development, differences between types of institutions and the absence of monitoring that Equity Groups' needs were being met appear symptomatic of a sector ineffectively coming to terms with the consequences of WP. Sector bodies responsible for funding and regulation, which might have been the appropriate sources of guidance and support in achieving WP were, for whatever reasons, not providing same. Beyond the provision of monies and need for HEPs to submit access statements largely relating to their policies, WP activities in the sector were seen to lack coherence, transparency and full integration into business models. Arguably, they were a low priority, see also S.5.7.

3.3.7.   International research on the effectiveness of widening participation (Bowes, et al., 2013b)

This HEFCE commissioned study informed the forthcoming National Strategy, S.3.3.8, its method was to (BIS, 2014d):

1. Analyse secondary information and statistical data from six countries whose HE systems and unequal rates of participation of various Equity Groups were similar in order/nature to England's: Australia, Ireland, Norway, South Africa and USA.

2. Use standardised analytical categories: widening access policies and practices, available financial support, overview of success and continuing challenges to WP, critique of strengths and limitation of available evidence, potential for transferability to England.

Whilst the report focused mainly on access, ie entry, to HE, rather than retention and progression, certain recommendations were common, for example (p. 4) [verbatim]:

1. "Approaches to information, advice and guidance need to be coordinated across the student lifecycle,

2. Ways of sharing and developing good practice between [HEP] professionals (in financial support, access and retention) could benefit from being more formalised,

3. Universal approach to retention coupled with targeted follow-up interventions might offer particular benefits,

4. The contribution of teaching and learning strategies to retention and student success should be recognised,

5. Funding mechanisms that reward institutions recruiting and retaining students from target groups are becoming standard practice."

3.3.7.1.   Discussion

Whole institution and whole student lifecycle approaches were explicitly mentioned in the findings, as were the contribution of appropriate teaching and learning strategies to retention and progression. Australia's First Year Experience and Transition Pedagogy were examined (p. 93), and included in the recommendation that a systemic approach comprised part of an effective retention and progression strategy. This study provided direct and unequivocal guidance to those formulating the national strategy for WP (p. 4):

> "Such further considerations should bear in mind that effective approaches to widening participation tend to be integrated across educational sectors, sustained, systemic, holistic (bringing together academic, financial and cultural capital-building support), practical, and efficient."

Despite elements of Bowes' et al. findings being referenced, their report does not appear to have had significant impact on the subsequent national strategy, S.3.3.8, which, whilst alluding to the need for such a holistic and coordinated approach, did not include explicit mechanisms to achieve this, missing the opportunity to implement other countries' apparently effective strategies. One approach where an attempt was made to implement a policy being discussed elsewhere, that Government funding be made dependent upon progress on retention, was contained in proposals that Teaching Excellence Framework (TEF) ratings [launched in 2017] be used to determine HEPs' ability to charge differential student tuition fees (Political Studies Association, 2016, p. 4). However, after a significant outcry, the Higher Education and Research Bill was amended and subsequently enacted (HERA, 2017) without any such linkage (NUS, 2017c). Similar proposals to link government funding to retention outcomes have successfully been adopted in Australia, see S.3.4.6.1.

3.3.8.   National strategy for access and student success in higher education (BIS, 2014d)

This report described a UK strategy aimed at enabling "all those with the potential to benefit from higher education [having] equal opportunity to participate and succeed, on a course and in an institution that best fit their potential, needs and ambitions for employment or further study" (p. 7). Establishing the strategy was seen as posing "highly complex challenges and issues" with success depending on "Government, HEPs, HEFCE and OFFA taking on clear roles and delivering on their responsibilities", the roles being:

1. Government: Sets policy framework,

2. HE system: Assumption of responsibility to ensure benefits from education are distributed evenly through continued and focus and investment,

3. HEFCE and OFFA: Continue to provide and ensure public and institutional investment, and challenge institutions.

The strategy envisaged (p. 8):

1. Greater collaboration and partnership at every level; the strategy would only be achieved through the coordinated support of all partners,

2. Evidence-based practice,

3. Coverage of the whole student lifecycle - entry to HE, progression and subsequent employment.

It saw its partners as "HEA, ECU, NUS (National Union of Students), QAA (Quality Assurance Agency)…to support development of knowledge, expertise and good practice to address non-continuation and disparities in attainment", funded by the Student Engagement Partnership (NUS, 2017b).

Whilst the strategy envisaged a " long-term 'whole institution' (WI) approach as crucial [to its success] the document seemed only to be concerned with ensuring that "HEFCE and OFFA [would] adopt a coherent approach when requesting information from institutions, within which publicly funded higher education providers can set out their strategies and targets for access and student success" (p. 11). There was no sense of monitoring, still less, evaluating whether, how and to what extent WI approaches were being implemented.   This absence was picked up in Thomas (2017, p. 3), see S.3.3.10.

The strategy's context was (p. 15):

1. Funding for teaching moving in AY2012/13 from public sources to student tuition fees (≤£9,000pa) supported by a student loans system,

2. HEPs being in increased competition to attract students to ensure tuition income,

3. OFFA's roles and resources being strengthened to "[safeguard and promote] fair access…[ensure] reforms to the higher education system do not unintentionally raise barriers to WP" with OFFA focussing on access, retention, student success and progression from HE".

The strategy aimed to address differences in UK HE outcomes by gender, ethnicity, disability, those leaving care, those from low-participation neighbourhoods, mature students, part-time students. For example, for disabled students, compared to sector-adjusted outcomes, take-up of DSAs conferred statistically significant improvement in gaining a degree and that degree leading to a graduate job or further study being in study (p. 50).

The strategy reviewed international interventions (pp. 58-59):

1. Australian universities where "nearly all" provided learning support to all students, not just those in an Equity Group. Academic Language and Learning staff also assisted with study skills plus work with academics in curriculum development,

2. US research showed that commencing students were often unable to keep up with the required levels of maths and English, influencing rates of non-completion. Mainstreaming extra support into the curriculum was the most effective mitigating strategy,

3. Irish Teaching and Learning Centres offered training for academic staff in developing inclusive approaches to their learning and teaching, assessment and student support,

4. For England, the issue of whether to use mainstream or targeted interventions was seen as complex, although no justification was given for England's situation being more or less complex than other countries'. Evidence suggested that the most effective approach appeared to be combining universal and targeted support, "initially taking a universal approach and then using targeted approaches once students' behaviour or performance indicate a greater risk of underachieving or withdrawing".

The strategy concluded that whilst the issues and approaches were not themselves new, a "new, more co-ordinated approach to retention, attainment and indeed the whole student lifecycle is required" (p. 59). Although the strategy stated "…and our actions reflect this [the need for coordinated support of all partners]" it failed to either summarise those actions or provide any detail.

In its management summary, the strategy stated the hope that (p. 13):

"[O]ur firm view is that a more coherent, collaborative approach, helped by sustained investment and resourcing, will ensure that the sector continues to make progress in making participation and success in higher education more equitable."

3.3.8.1. Discussion

In one sense that hope was fulfilled, Government investment and resourcing, and monies from HEFCE were available. However, the strategy was silent regarding how coherence, coordination and collaboration could be delivered. This absence was surprising given the detailed discussion of the Australian FYE initiative and its Transition Pedagogy (Kift & Nelson, 2005); (Kift, 2009); (Kift, 2015), which offered a coherent and academically-based approach, and despite the, by then over a decade's expertise. Additionally, there was neither a guiding body nor guiding 'mind' proposed to lead or drive the future national strategy forward to delivery, which appears a glaring omission, likely to have left the strategy, whatever its merits, unfulfilled.

Against this background the DSA Modernisation was launched the same month.

3.3.9. Student Opportunity outcomes framework research (Bowes, et al., 2015)

This study proposed a conceptual framework to evaluate WP to understand the relationship between (pp. 1-2):

1. Inputs (WP funding), activities and resources (WP interventions), and
2. Outputs and outcomes (such as student success measures) that led to "impacts for the individual, the local region and for the economy and society"

The research selected a representative sample of 25 HEPs covering a variety of institutional types, tariff levels and retention rates. Primary field work involved physical visits and follow-on conversations. Drafting the evaluation framework was supported by literature review and regional consultation conducted with three sample institutions.

Parallel econometric analysis explored potential linkage between funding inputs and degree success, and employment outcomes

The research found a relationship between HEFCE's Student Opportunity (SO) funding and increased degree attainment, especially for students from more disadvantaged areas. Each additional £1.00 of SO funding yielded between £7.70-£9.00 of economic benefits for graduates on a Net Present Value (NPV) basis, suggesting that SO funding was "justified on efficiency grounds" (p. 87).

The authors also proposed a framework to measure the student opportunity outcomes, Figure 7, which showed the way the articulation of the problem (vertical axis and arrows) drove the sequence of events leading to the impacts sought (horizontal axis).

Figure 7: Evaluative techniques and the levels of the evaluation framework that they can provide evidence towards (Bowes, et al., 2015, p. 19)
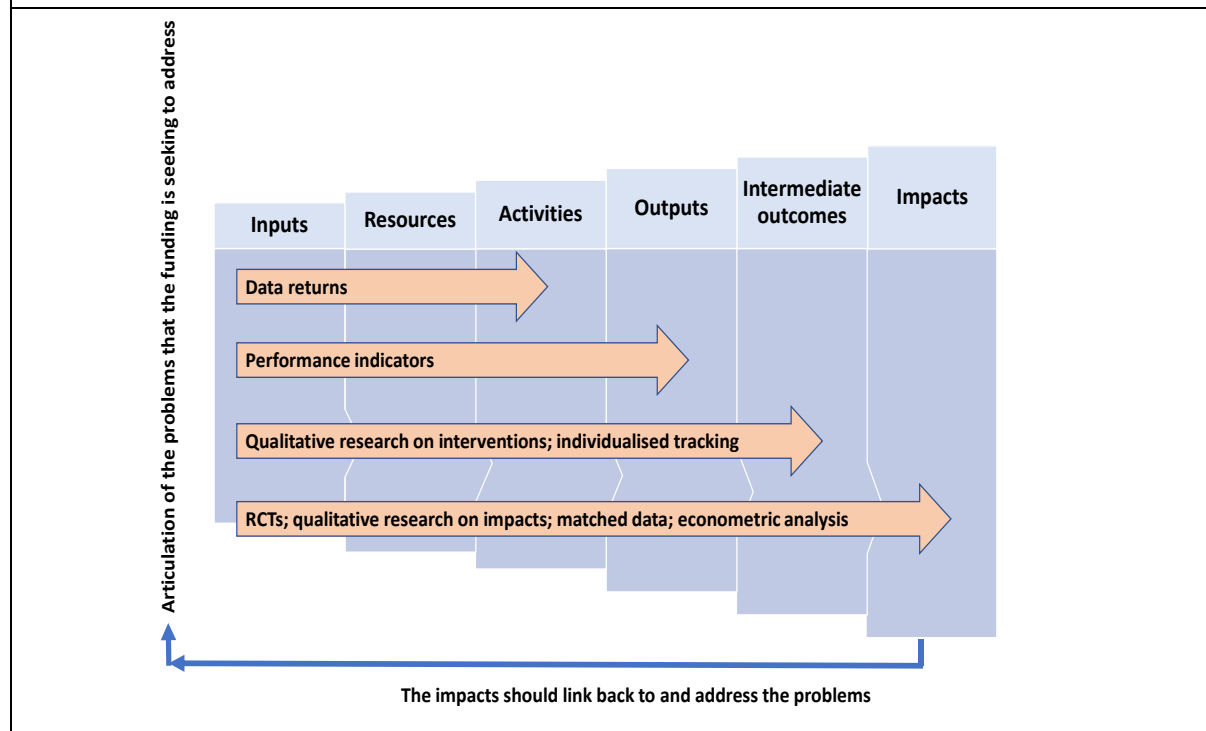
3.3.9.1.   Discussion

The report usefully demonstrated the idea that merely 'willing the aims' of a policy was insufficient to achieve it. Rather, a range and sequence of activities, including monitoring, evaluation, effective feedback mechanisms and meeting of performance indicators were required to reach the goals. Additionally, the report's use of logic chains to identify linkages influenced this research's conclusions which identify potential linkages in the dimensions of ITL, see S.6.2.

3.3.10.   Understanding a whole institution (WI) approach to widening participation: Final report (Thomas, 2017)

Thomas based her OFFA-funded report, on a literature review of the international experience of WP, five English HEP case studies and a participatory workshop to deliver a detailed analysis plus explicit recommendations to operationalise a WI approach.

Her research questions were:
1. What is involved in a WI approach?
2. How can a WI approach be implemented and managed?
3. What strategies and tools can be used to evaluate a WI approach to WP?

She found that achieving WP outcomes required providers to take a WI approach, but they were not so doing. Initiatives often lacked coordinated activities. Quoting her own research "91% of institutions discussed retention issues, only 53% referred to their teaching & learning strategy…[as a factor in improving retention] and [only] 42% of institutions identified staff training to support wider engagement in WP" (Thomas, et al., 2010).

She examined the issue of whether WP was a complex system comprising independent groups working in uncoordinated ways, or a complicated one of independent groups working in a coordinated way to agreed goals, concluding the latter approach was superior to avoid duplication, gaps and fragmentation.

Thomas proposed that WI activities be examined to identify causal links between action and WP goals, identifying the importance of evaluating the processes which were needed to achieve WP goals not just the goals' achievements. In addition to identifying the 10 core features of a WI institution she proposed a WI maturity model, based on Gale (2009b), Kift (2009) and the Australian FYE, where institutions pass through a 'three generation' WP lifecycle: Individual champions, pockets of excellence finally an inclusive institution, Figure 8.

Figure 8: WP maturity model (Thomas, 2017, p. 17)
1st generation: Individual champions
Project work and additional support, initially to widen access, and then to support success
⬇
2nd generation: Pockets of excellence
Some teams and groups working well across the [student] lifecycle

(WP teams, academic courses, student services etc)
3rd generation: Inclusive institution
Whole institution approach: working across the lifecycle and student experience, involving all staff

However, whereas Thomas' 3rd generation identified merely working across the student experience, Gale called for a radical overhaul of the curriculum to implement his Southern Theory; this is based on the notion that the social theory underlying HE derives from the global north thereby failing to account for the voices and knowledge from non-dominant peoples, see S.3.3.4. However, it could be that Thomas is similarly referring to students' cultural and social capitals but without envisaging a radical curriculum overhaul.

Thomas highlighted that a WI approach must focus both on the whole student lifecycle, pre-entry to post-departure but also consider students' daily lived experience, the vertical and horizontal alignment respectively in Figure 9. This schematic was expanded into 11 statements regarding managing and implementing a WI approach.

Figure 9: Vertical and horizontal alignment (Felten, et al., 2016) in (Thomas, 2017, p. 19)
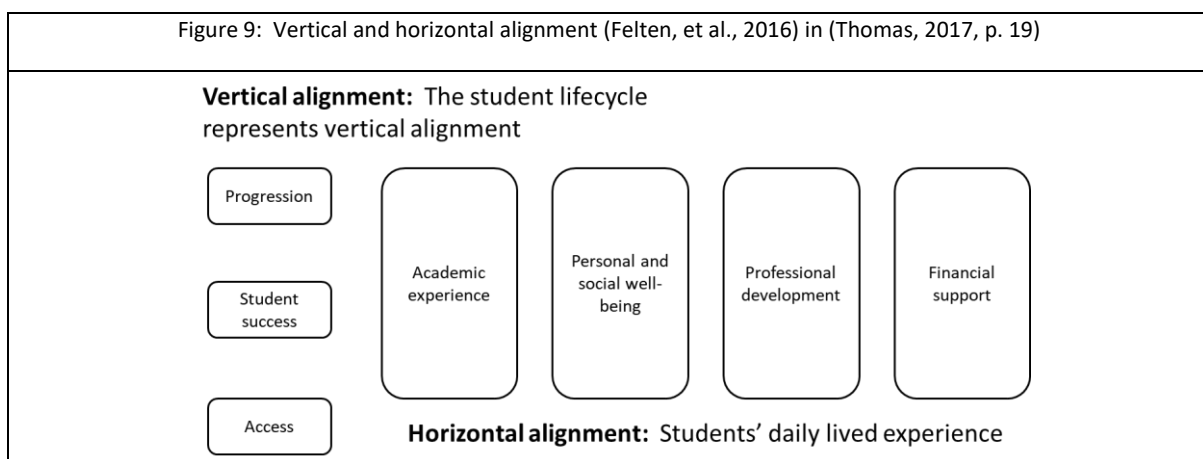
Thomas called for a top-down, bottom-up approach as "…HE staff will not be equally committed to and passionate about WP" (p.22) and that achieving May & Bridger's (2010, p. 36) organisational change to achieve WI required institutional and individual level change. She also commended the Australian FYE idea of Transition Pedagogy (p. 22). To assist the implementers of WI, Thomas helpfully defined the terms "structure" and "culture", both of which needed to adapt to achieve WI, again following the Australian FYE experience where structure "may be seen to promote, 'nudge' or push people towards the desired culture…and plays a key role in avoiding fragmentation" (Kift, 2009) in (p. 25), see also S.3.4.6.

Thomas emphasised the need for evaluative strategies and tools (p.28 - 38), and that their "aim should be to evaluate progress with respect to the process of establishing a whole institution (WI) approach (or an inclusive institution) rather than the outcome *per se."* (Rao & Stuart, 1997, p. 16) in (pp. 28-38), summarised in Figure 10.

Figure 10: Whole Institution (WI) evaluation model, based on (Thomas, 2017, pp. 28-38)
Whole institution approach (focus on accountability & improvement)
Core features   **Additional features**
⬇
Inclusive culture and structure, role of evidence   **(focus on accountability, improvement and impact)**
Assessment of progress
⬇
Impact on students & graduates
Participation, retention, attainment, progression

3.3.10.1. Discussion

This detailed report provides useful operationalising guidance to achieve a WI approach and assess progress towards it, for example by providing a set of checklists. However, there was no such checklist to evaluate the effect of WI activities on students, which introduces a weakness into an otherwise comprehensive document.

3.3.11. Widening Participation - Conclusion

International research and data from English HE showed that each of WP's three components, entry, retention and progression needed to be addressed for each Equity Group for its aims to be fulfilled. Merely focusing on the political expedience of equity in entrance numbers and the availability of 'bolt-on' support were insufficient actions to achieve success in retention and progression. Changes to curriculum delivery were needed to address the diverse student body resulting from the participation of learners from non-traditional backgrounds. Whilst funding and resource were also pre-requisites of success, just willing the ends of WP were insufficient. Support in operationalising WP needed to be delivered to providers individually and across the sector to achieve the necessary WI coherence, coordination and collaboration envisaged in the National Strategy.

This review shows that at the point which the 2014 Modernisation was announced WP implementation at UK HEPs was very much still a 'work in progress' with sector leadership in operationalisation largely absent. WP was weighted towards entry equity, less to progression and retention, and still less to curriculum modification.

Achieving changed curriculum delivery to help a diverse student body thrive as part of WP, which is a key element of inclusive teaching and learning, is explored in the next section.

3.4.   Inclusive Teaching and Learning

3.4.1.   Barriers to Learning: a systematic study of the experience of disabled students in one university (Fuller, et al., 2004a)

In a companion paper to Fuller (2004b), above, a 6-stage model, based on work done regarding recruiting and retaining women in science was identified to establish the stages through which an HEP progresses towards delivering inclusive teaching, based on Schuster and Van Dyne's (1985) work:

1. No notice taken of the lack of disabled students,
2. Absence of disabled students noted,
3. Exploring why there is a lack of disabled students,
4. Analysis of disabled students' experiences of teaching, learning and assessment,
5. Challenging the paradigm – changing the curriculum and learning environment,
6. A transformed inclusive system.

3.4.1.1.   *Discussion*

This early paper appears prescient in its identification of HEPs' steps towards removing barriers to disabled students: problem recognition, analysis and definition followed by action. Discussing the above six steps in more detail:

a. Entry to HE: Stages 1-2 relate to attracting disabled students into HE. Much of the UK's National Strategy, S.3.3.8 focussed on socio-economic and ethnic Equity Groups rather than disabled students, as revealed by HESA data (HESA, 2019b). Gale noted the same in Australia (2009b, p. 3). However, for specialist and smaller HEPs, where WP was part of their business model, their culture would possibly be more attuned to noticing disabled students' relative absence significantly sooner than HESA's data releases which appear to lag academic years by approximately 18 months,

b. Analysing absence: Conjecturally, at least three factors might influence disabled students' participation in HE:

    a. Pervasive societal attitudes experienced and internalised by disabled people (Oliver, 1990): (Charlton, 2000),

    b. Effectiveness of HEPs' outreach activities,

    c. HEPs' 'welcome' for disabled students.

The first two are beyond the scope of this research, however, the third could be regarded within the province of inclusive practices encompassing pre-entry visits, induction programmes, tutor knowledge and support, inclusive teaching and learning, and co-curricular support,

c. Challenging the paradigm: The curriculum and learning environment are HEPs' core functions, delivered in England by over 133,000 academics in AY2016/17 academics arguably trained in the 'old paradigm' of non-inclusive teaching (HESA, 2018a). Changing these academics' beliefs, values, awareness, knowledge, skills, practices

and engagement with disabled students and their needs would most likely be the major challenge of any paradigm change, as reflected by Kuhn (1962/2012),

d. Transformed inclusive system: This deceptively simple phrase encompassed the operationalisation - delivery and ongoing practice - of inclusive teaching, about which the paper was mute, possibly as the authors, and their HEPs had not yet progressed through to Stage 6.

3.4.2.   Towards Inclusive Learning in Higher Education: Developing Curricula for Disabled Students (Adams & Brown, 2006)

Before the National Disability team's absorption into HEA and ECU in 2005 (Pollak, 2009, p. 24), the authors drew on its work to monitor the effectiveness of HEFCE's special projects, providing a multi-item "manifesto for mainstreaming inclusive practice" which can be subdivided into four categories:

1. Integration:
    a. Stop focusing predominantly on adjustments for individuals, from the outset build practices which align to their abilities into the curriculum and assessment,
    b. Think in an integrated way, share across the "silo mentality", use disability practitioners and academics in design,
    c. Capture and disseminate good practice,
    d. Ensure that disability projects gain long-term commitment and are not delivered by temporary staff whose knowledge is lost when they leave,
2. Student involvement:
    a. Engage students in curriculum design,
    b. Engage students in assessment designed to verify that the choices given are genuine equivalents,
    c. Learning must be seen from the learners' perspective,
    d. Embed disability matters into curriculum for all students so students themselves engage in inclusive practices,
    e. Students are consumers who deserve value for money,
    f. Students are consumers and delivering an appropriate 'product' for them is a good business case.
3. Technology
    a. Use technology to support inclusive practice but test for barriers it may erect if poorly designed.
4. Staff development
    a. Harness the idea of social justice, equality and fairness to motivate staff,
    b. Must be pragmatic and engaging,
    c. Must acknowledge that terminology can be fuzzy and disability complex,
    d. Acknowledges that there will be both generic and subject-specific changes which will be required,

     e. Changes should ensure that standards are maintained in quality, scope and scale of work,

     f. Development of inclusive practice should be evidence-based.

3.4.2.1.   Discussion

With the benefit of hindsight, this manifesto appears ahead of its time, especially regarding listening to the student voice, thinking of inclusive practices as attractive product features and engaging in integrated thinking. The manifesto's content could provide a route to Fuller's et al. (Fuller, et al., 2004a) idea of a 'transformed inclusive system'.

3.4.3.   Dyslexia and difficulties with study skills in Higher Education (Mortimore & Crozier, 2006)

In this qualitative questionnaire survey of 136 male students, 62 with dyslexia, 74 without, from 17 British HEPs dyslexic students reported wide ranging and longstanding (at primary, secondary and tertiary educational levels) difficulties in skills and academic tasks, eg notetaking, essay organisation, expressing ideas in writing. Additionally, they identified needs in organising coursework, learning in lectures and academic writing skills. Whilst the non-dyslexic group also reported similar problems as the dyslexic group, the rate of reporting was much lower. Frustration was expressed in the lack of integration between those supplying the support and subject lecturers, the latter perceived as having little knowledge of practical ways to 'deal' with students with dyslexia. In their literature review, the authors identified the importance of understanding the way in which the institution placed "obstacles in the way of [individual student] empowerment" regarding dyslexic students' needs (p. 237).

3.4.3.1.   Discussion

This study, although potentially weakened by its male-only orientation, highlighted the need to understand the specific needs of an Equity Group as a first step in meeting those needs. One such need was integration between the study support and academic departments; students identified the weakness of study support trying to 'repair' the problems created by the course and those delivering it.

3.4.4.   Developing and embedding inclusive policy and practice in Higher Education (May & Bridger, 2010)

HEA funded this 10-HEP (eight post-1992) project which required each participating organisation to identify, define, implement, embed and evaluate change initiatives related to its own concept of inclusive teaching and learning. The purpose was to provide the sector with "greater understanding of the processes involved in developing inclusive policy and practice" (p. 7). Participants' projects applied to different areas within their operations, eg curriculum delivery, assessment, learning support infrastructure, implementing

e-learning, developing academic literacy. However, common features in participants' approach were that the multiple methods used to effect change and:

1. Addressed their organisations' whole systems (ie WI) thereby being implicitly holistic,
2. Were proactive, iterative and longitudinal,
3. Built and used an evidence base as they progressed,
4. Promoted shared responsibility for change and outcomes.

Part of the systematic approach involved identifying five external and five internal drivers for change eg legislation, quality assurance and institutional mission, CPD/developing professional practice (p. 21). A further element in effecting change was to involve stakeholders, with eight approaches identified, eg creating advisory/working groups, using advocates/champions, through CPD. They developed a five-stage structured approach to thinking about change, Figure 11.

Figure 11: The process of change (May & Bridger, 2010, p. 38)

What change are we seeking to make?

Why are we making this change?

Who are we going to involve in achieving the change?

How do we get others on board and respond to emerging challenges?

How do we pass on ownership for the change?
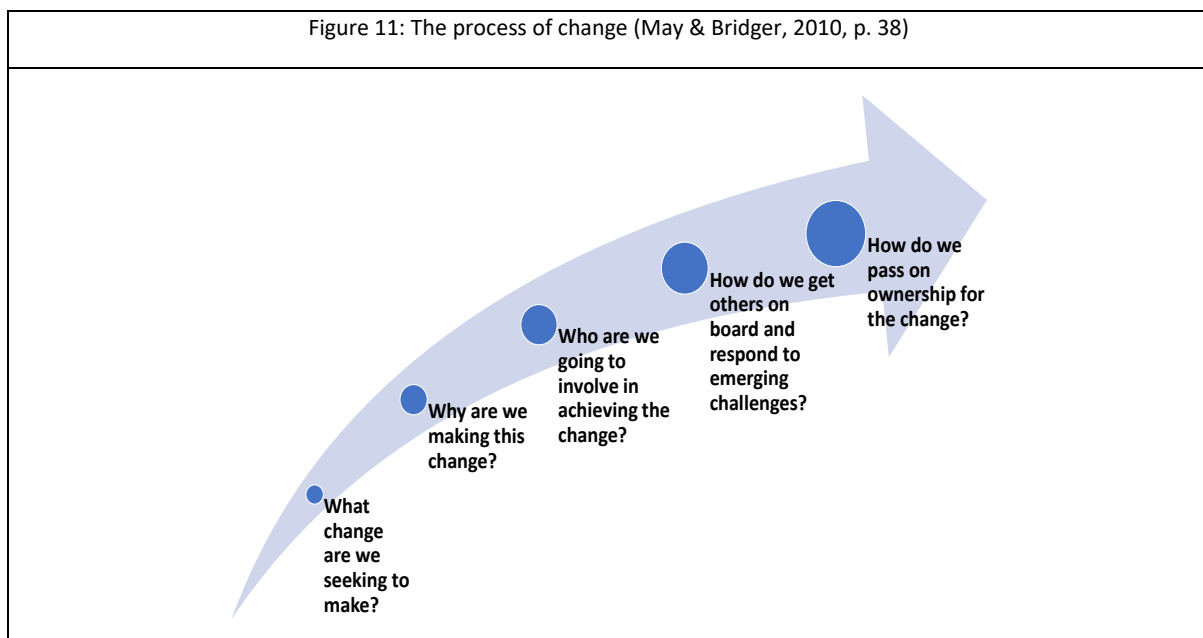
The project identified the importance of initiatives reaching a tipping point, "the moment of critical mass…at which the momentum for change becomes unstoppable" and the importance of multiple teams' efforts in its achievement (Gladwell, 2000) in (May & Bridger, 2010, p. 91). At the point of 'tipping' a community of practice has developed, the novel has become conventional, a shared professional identity and tacit knowledge are in place; the new paradigm has been established (Kuhn, 1962/2012) in (May & Bridger, 2010, p. 93).

The authors identified a strong resemblance between their findings regarding the importance of a WI approach and McKinsey's 7S Framework for organisational change (Strategic Management Insight, 2013); (May & Bridger, 2010, pp. 94-95), especially in that model's elucidation of the difference between 'hard' factors – strategy, structures, systems, and the 'soft' factors – style, staff, skills, shared values.

3.4.4.1.   *Discussion*

This project came at a time when HEPs needed to address their compliance with the recently enacted Equality Act (2010) and by its 10-participant nature provided a rich variety of ideas and approaches. Notwithstanding that diversity, the project distilled four common elements of success, see numbered list above.

HEPs' individual projects addressed both policy and implementation. Hence, of the various papers in this review, which address operationalisation and the management of change, May & Bridger's offers the most comprehensive set of practical insights.

This research's conclusions build upon May & Bridger's ideas regarding external and internal influences upon HEPs' activities to conceptualise the dimensions of ITL, the resemblance to McKinsey's 7S model and uses the idea of the requirement for reaching a tipping point in suggesting that the sector needs a driving 'mind' to achieve widespread acceptance of the paradigm of inclusivity, see S.6.2.

3.4.5.   Confronting similar challenges: Disabled and non-disabled students' learning and assessment experiences (Madriaga, et al., 2010)

This single HEP, mixed method, matched pair study with follow-up focus groups surveyed 172 disabled and 312 non-disabled undergraduate students, identifying similarities and differences in the barriers to learning faced by each group. The study examined the teaching and learning experience of all students.

Results identified significant differences in mean scores in eight areas where disabled students reported greater difficulty than their peers, Table 6 (complete table including standard deviations, shown in Appendix 5, S.11.

Table 6: Significant differences in mean scores by area of difficulty by disability status. Likert scale responses where 1 = strong agreement with statement, 5 =strong disagreement. Simplified adaption from (Madriaga, et al., 2010, p. 652)		
I have problems/difficulties with:	**Disabled students**	**Non-disabled students**
	[Lower scores =more agreement with statement]	
Taking notes	2.66	3.65
Hearing lecturer	3.51	3.83
Reading course materials	2.88	3.25
Physical access to building	4.15	4.34
Handouts/other materials not being in an appropriate format	3.15	3.90
Writing continuously in exams	2.54	3.03
Giving oral presentations	2.87	3.18
Literacy skills (spelling, grammar etc)	2.48	3.49

The authors noted that disabled students' qualitative responses further illustrated examples of bad teaching practice which led to difficulties, eg lecturers speaking too quickly, being singled-out for using a laptop required by virtue of disability, lecturers being unaware of a disability despite difficulties being apparent, unavailability of course materials. Other

reported issues included delays in releasing assignments leading to difficulties in time to conduct the required reading, clash of deadlines for major pieces of coursework.

Additionally, the study provided reliable support to the idea that inclusive policy and practice can benefit all students, finding considerable similarities across all groups, ie all students in 22 areas of their experiences, both in their qualitative and quantitative assessments, Table 7 (complete table including standard deviations, Appendix 5, S.11.

	Questionnaire statement (5=Disagree strongly; 1 =Agree strongly)	Disabled group sample	Non-disabled group sample
	Table 7: Means scores for disabled and non-disabled students for the following statements ranked by eta squared (from least to most) [Eta scores: the larger the score, the larger the difference between the scores. This tables shows most similar at head and least similar at foot] (Madriaga, et al., 2010, p. 655)		
1	The feedback on my work helps to clarify things that I haven't fully understood	3.46	2.47
2	My lecturers make a real effort to understand difficulties I may be having with my work	3.32	3.30
3	I have had difficulties due to lectures, seminars, workshops interfering with mealtimes**	3.67	3.69
4	My lecturers give me helpful feedback on my progress	3.35	3.33
5	The feedback on my work helps me improve my ways of learning and studying	3.66	3.63
6	My lecturers have been helpful when I have approached about difficulties in my studies	3.83	3.78
7	I find some teaching staff uncooperative**	3.25	3.18
8	My lecturers make it clear right from the start what they expect of me	3.26	3.31
9	My lecturers normally give me useful comments on my work	3.42	3.50
10	My lecturers give me plenty of examples and illustrations to help with my understanding	3.42	3.50
11	My lecturers are good at explaining things in a number of different ways	3.44	3.52
12	The handouts and/or other materials on WebCT/Blackboard are helpful	3.98	4.06
13	I sometimes find it difficult to discover what is expected of me in coursework**	2.40	2.49
14	Within my course, I have some choice over what aspects of the subject I choose to concentrate on	3.39	3.29
15	My course is helping me develop my ability to work as a team member	3.83	3.90
16	I frequently find it difficult to participate in discussions**	3.51	3.61
17	I have experienced difficulties with coursework because it is not always clear what is required**	2.29	2.49
18	The workload is too heavy**	2.76	2.86
19	I have some difficulties with participating in assessed group work	3.13	3.26
20	I have experienced difficulties with the amount of time available to complete coursework**	2.42	2.57
21	My course is helping me to develop the ability to plan my own work	3.69	3.82
22	It is easy to know the standard of work expected	3.29	3.44
Notes: ** Scoring reversed			

The authors concluded, significantly, that whilst "a greater proportion of disabled students…mentioned they had experienced difficulties in learning due to individual impairments compared to non-disabled students…their challenges were not the preserve of disabled students" (p. 656). In other words, *all students* [original emphasis] would benefit from disabled student support, inclusive practice and an agenda which did not discriminate between disabled and non-disabled students. They stated that staff disability awareness, disability disclosure, providing a sense of inclusivity in teaching, learning and assessment required urgent attention. That agenda "should not be cast as an equality and diversity issue, but a *quality* [original emphasis] issue (Hanafin, et al., 2007) in (Madriaga, et al., 2010, p. 657).

3.4.5.1. *Discussion*

This report indirectly highlights the continuum in students' abilities to access, participate in and succeed with their studies, which variability SpLD diagnostic assessments amply report (Jones & Kindersley, 2013). However, DSAs and eligibility for their receipt introduce a 'binary' element in the provision of support to students – if disability is identified, then support is funded, if not, then support is not DSA funded, and potentially unavailable.   The continuous range of student abilities strongly counsels for the universal availability of student support of the type delivered to disabled students.

Unfortunately, whilst the authors stressed the urgency of addressing the issues they identified, some areas, for example inclusive teaching and learning, they felt may not have been driven at appropriate speed.

3.4.6. **Transition Pedagogy – Australia 2009 and 2012**

Although small-scale studies reporting on HEPs' work on transition into HE have occurred in the UK, eg the West Midlands Good Transitions project (French, et al., 2015/16), Glasgow Caledonian's transition initiative (Benske, et al., 2011), University of Suffolk's Connected Approach (Gartland & Smith, 2015/16), this section reviews two linked Australian papers due to the breadth and depth of the initiatives they describe. The papers, *Articulating a transition pedagogy to scaffold and to enhance the first-year student learning experience in Australian higher education* (Kift, 2009) and *A transition pedagogy for student engagement and first-year learning, success and retention* (Nelson, et al., 2012), describe a sector-wide approach which established an academic basis for a transition pedagogy, and its dissemination and adoption across Australian HEPs. Indeed, the initiative proved sufficiently successful for the Australian Government to include retention rate as part of its formula to determine HEPs' funding from 2020, see immediately below S.3.4.6.1.

Responding to the Australian Government's WP aims, Kift's Fellowship project aimed to "improv[e] the student learning experience in order to boost retention, progress and ultimately, completion rate" (Department of Education, Employment and Workplace Relations. Canberra ACT, 2009) in (Kift, 2009, p. 1). Her approach appears innovative in being broad and deep, collaborative, planned, transparent, evidence-led and aimed squarely at the gap identified by Gale (Gale, 2009a), that to achieve inclusion, the curriculum and its delivery needed to change. Specifically, she focussed on existing initiatives in undergraduate students' First Year Experience (FYE), conceiving the idea of a coherent Transition Pedagogy (TP) to deliver an effective FYE, key elements of Kift's Fellowship approach were:

1. Assembling "large and inclusive Fellowship collaborative team" of 26 individual collaborators from 13 national and five international HEPs,
2. Engaging with a 'trusted friend', her Fellowship Evaluator,

3. Ensuring data availability and transparency by obtaining ethics approval for collaborators, institutions, workshop/seminar feedback,
4. Creating a Fellowship website and associated content,
5. Appointing researcher and other assistance to 'leverage' her own time,
6. Creating coherence by developing a case study protocol, including expert review,
7. Collecting 1st year curriculum case study data from seven HEPs,
8. Referring case study data to individual expert commentators for insights, observations and synthesis across 17 commentary areas/perspectives,
9. Convening a Fellowship Expert Seminar,
10. Holding a First Year Experience (FYE) Curriculum Design Symposium.

Kift's starting point was that her research responded to previous piecemeal approaches to FYE and the observation " 'substantial gains in student retention have been hard to come by' and 'there is much to be done to translate our research and theory into effective practice' " (Tinto, 2006-7) in (Kift, 2009, p. 1). Additionally, FYE initiatives were "rarely…linked across the institution…effort needs to be directed at moving enhancements towards more holistic and sustainable institution-wide approaches and enhancements" (Krause, et al., 2005, p. 89) in (Kift, 2009, p. 1). Doing so was neither straightforward nor unproblematic: the challenge of 'bridging the gaps between academic, administrative and support programs' was substantial (McInnis, 2003, p. 13) in (Kift, 2009, p. 1) [Note: The original citation in Kift was incorrectly given as a different paper by McInnis, also from 2003].

Kift identified 3 generations of FYE curriculum enhancement for Equity Groups, echoing Gale (2009a):
   a. 1st generation: Primarily comprising co-curricular activities,
   b. 2nd generation: Enhancing the student experience through pedagogy, curriculum design, and learning and teaching practice in the physical and virtual classroom. Kift saw the curriculum as glue holding together knowledge and the wider student experience together' (McInnis, 2001, p. 13) in (Kift, 2009, p. 1),
   c. 3rd generation: Whole of institution transformation. Kift saw this generation only occurring through 1st and 2nd generation approaches being combined in a comprehensive, integrated, and coordinated strategy. That strategy would deliver a seamless, whole institution (WI) FYE, across "all of its disciplines, programs, and services". Kift realised that 3rd generation FYE strategies would require "an institutional vision…shared by academic and professional staff who form sustainable partnerships across institutional boundaries to ensure its enactment" (Kift, 2009, p. 1).

Kift articulated a research-based TP, "a guiding philosophy for intentional first year curriculum design and support that carefully scaffolds and mediates the FYE for contemporary heterogeneous cohorts" (Kift, 2009, p. 2). This heterogeneity was attributed to previous educational provenance. Unfortunately, Kift omitted to include disabled

students as an Equity Group in this attribution of heterogeneity, perhaps succumbing to Gale's fear that disabled students are sometimes lost from consideration, (Gale, 2009a, p. 3). Kift suggested a blueprint comprising six First Year (FY) interconnected and organising Curriculum Principles that "stand out as supportive of FY learning engagement, success and retention":

1. Transition,
2. Diversity,
3. Design,
4. Engagement,
5. Assessment,
6. Evaluation & monitoring.

Kift made six recommendations:
1. Develop these FY principles,
2. Consider investigating & articulating sector-wide standards for undergrad FYE,
3. Align top-level institutional policies with transitional learning and support needs of diverse FY cohorts,
4. Establish an FYE community of practice,
5. The adoption by Australian Learning & Teaching Council (ALTC) of a leading role in sector-wide FYE,
6. An ALTC Leadership Project be commissioned to facilitate, enable, and enact academic and professional partnerships.

Kift and collaborators (2012) expanded and provided significant substance regarding Queensland University of Technology's (QUT) 3rd generation FYE implementation, including a theoretical model, Figure 12, which summarised key strategic and operational interventions against each strategy and examples of the transition pedagogy in action organised by FY curriculum principles and guiding strategies.

Figure 12: Transition Pedagogy Implementation Model (Nelson, et al., 2012, p. 131)

First Year Curriculum Principles (FYCPs)

Design
Transition
Engagement
Diversity
Assessment
Evaluation

Assessment, pedagogy, and teaching practice designed to engage learners

Sustainable academic-professional partnerships

Proactive and timely access to learning and life support

Internationally fostering a sense of belonging

Key student engagement, success and retention strategies

3.4.6.1. *Discussion*

The Australian FYE activities together with Kift's and co-authors' participation appear to stand out as an exemplar of an initiative which:

1. Aimed at supporting governmental policy but was not dictated by government,
2. Stressed the importance of providers' having the correct policies and leadership in place which provided operationalisation detail,
3. Offered coherence which allowed HE providers flexibility to operationalise according to their circumstances,
4. Was led by people located within individual providers giving sector-wide participation and dissemination through transparent events and publishing.

The FYE initiative, in various forms ran for 19 years to 2014, and far from interest in FY waning gave rise to a wider initiative from 2015 to date, Student Achievement Transitions and Success. Proceedings of conferences from 1995 were freely available under an open access policy (STARS, 2020). Kift acknowledged the progress made in correspondence with the researcher (Kift, 2020):

> "If anything, the focus on the FYE has become even stronger over the years, due to the regulatory requirements now of the Higher Education Standards Framework (Threshold Standards) 2015 (Australian Government, 2015)…and also because, as from 2020, the government has introduced performance based funding, one of the measure for which is first year attrition"

Those standards refer explicitly to providers' activities regarding students' transition into HE. It will be interesting to observe the progress with performance based funding as this was attempted in the UK but withdrawn after sector outcry, see S.3.3.7.1.

3.4.7. The impact of institutional, programmatic and personal interventions on an effective and sustainable first-year student experience (Wilson, 2009)

This paper comprised one Australian provider's (Griffith University) experience implementing the FYE model, its details are shown in Appendix 6, S.12. The results were:

1. Its first year of implementation (2007) saw a 13% improvement in student retention even with lowered entry level scores compared to prior year. 2008 retention data showed in top 30% of national programmes [the paper did not identify prior years' performances]. Institutional data showed "gradual increase in all key indicators, and places them above Griffith averages",
2. For those students who participated in the voluntary help-seeking programme (30-40% of those invited) 90% succeeded in submitting their next piece of assessment *vs* 78% of those who did not participate; 100% of those who participated and submitted their next assignment passed *vs* a base pass rate of 77%. Overall, 60% of participating students passed the course *vs* 24% in a non-intervention group,

3. Strategies needed to be both effective (What works?) and sustainable (Can we reasonably continue to do it?) (p. 16). The provider [verbatim]:

"Need[ed] to avoid reinventing the wheel and feel increasingly tired doing it, avoid bootstrap innovation (viz., let's try this and see what happens). And use data of multiple natures in non-defensive reflective examination:

    a. Student feedback,

    b. Partner feedback (eg mentors, tutors),

    c. Staff feedback (eg convenors, tutors, administrators),

    d. Institutional surveys,

    e. Course evaluations,

    f. Student outcomes (eg submission and pass rates for assessment items),

    g. Informal and incidental observations, conversations."

3.4.7.1. *Discussion*

Although Wilson identified a significant jump in retention for Bachelor's level students in the project's first year (2008 *vs* 2007 and earlier), the subsequent years, although unknowable at the time, whilst showing a somewhat raised 'plateau' were not able to maintain the change momentum, Figure 13.

Figure 13: Griffith University Bachelor Degrees Retention Rates 2005-2017 (Australian Government Dept. of Education, Skills, Employment, 2018)
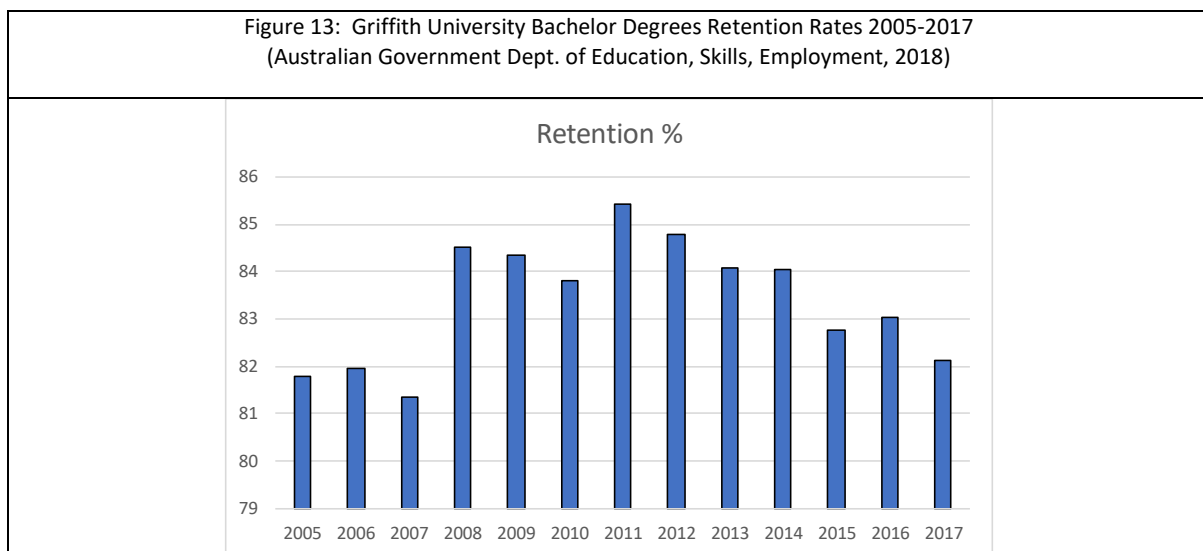
Wilson talked passionately about the importance of ensuring success in students' earliest academic efforts by offering formative assessment opportunities, access to explicit and additional tutorials as well as support to aid 'academic recovery' should students' efforts fall short. One suspects she had met some opposition from peers, in response she offered some useful advice (p. 11), that what was offered:

1. Was not 'hand holding',
2. Enabled students to form successful study habits early,
3. Should balance challenge and support,
4. Did not practice "cruel…social Darwinism" nor "social welfare".

3.4.8. **Inclusive learning and teaching in higher education: a synthesis of research (Hockings, 2010)**

Hockings' HEA report provided a definition of ITL in HE as (2010, p. 1):

> [T]he ways in which pedagogy, curricula and assessment are designed and delivered to engage students in learning that is meaningful, relevant and accessible to all. It embraces a view of the individual and individual difference as the source of diversity that can enrich the lives and learning of others.

Hockings built on this statement of principle by developing operationalising approaches, based on contemporary academic literature, covering:
1. Inclusive curriculum design (p. 22),
2. Inclusive curriculum delivery (p. 28),
3. Inclusive assessment (p. 34),
4. Institutional commitment to and management of inclusive learning and teaching (p. 40).

Hocking also presented a set of 11 principles for practitioners, Appendix 7, S.13, which she invited HEPs to consider and adapt to their own specific circumstances, and provided a brief explanation of how one principle might be operationalised, Principle 9 – "The need for adequate time, resources and a safe environment" (p. 48).

3.4.8.1. *Discussion*

This report could be considered a blueprint for HEPs to follow and may have met with some success. Hockings' definition was the most cited in FOIR2 as having been adopted by 12 HEPs. However, at only 24.0% of those which possessed a definition (50) and 9.1% of the total respondents (132) the sector appears not to have taken full advantage of the definition's merits, see S.5.7.4.1. Similarly, by the absence of its wholehearted endorsement in later HEFCE, HEA, ECU sponsored research and associated reports it seems quite possible that its guidance regarding operationalisation was also not widely adopted, contributing to failure to utilise a potential set of metrics by which to gauge progress towards ITL. Further, for example HEFCE's (later OfS) two-part research *Models of Support* (Williams, et al., 2017) and *Review of Support for Disabled Students* (Williams, et al., 2019), see above, although asking respondents to self-assess their progress towards offering inclusive support, gave no metrics against which to make judgements. Therefore, it seems that a 'longitudinal' coherence was not promoted by organisations which might be thought of sector leaders.

3.4.9. **Managing Reasonable Adjustments in HE (Equality Challenge Unit, 2010)**

Responding to the EA (2010), ECU conducted questionnaire research at 30 self-selecting HEPs, followed-up by 10 in-depth telephone interviews investigating how providers managed and funded the provision of reasonable adjustments for disabled students and

staff in HE. A team of consultants, advised by a cross-sector group, executed the project.
Besides providing numerous examples of potential good practice it discussed the 'business
case', the benefits to HEPs of strategic approaches to reasonable adjustments, as opposed
to merely reacting to individual requests, Figure 14.

Figure 14: Benefits of strategic approach to providing reasonable adjustments (Equality Challenge Unit, 2010, p. 8)
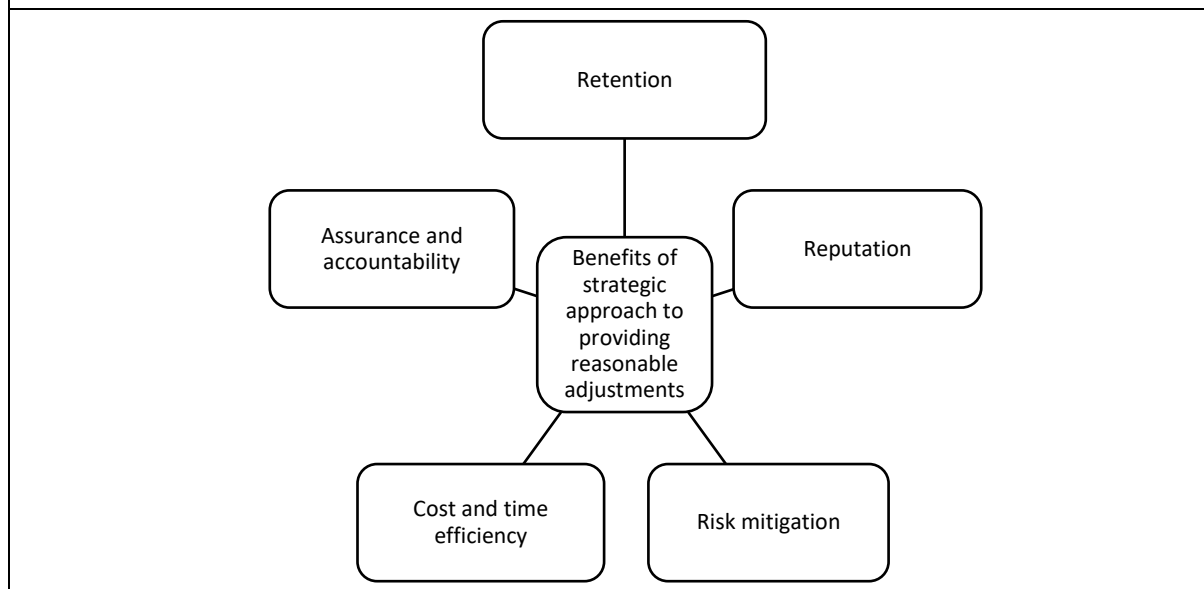
The research also illustrated the three levels of approach to reasonable adjustments which
HEPs could adopt, individual [reactive], anticipatory and inclusive, this latter being
equivalent to WI. Using this tiering, the final report gave examples of adjustments in each
category, both acknowledging and demonstrating that even with WI approaches, additional
anticipatory and individual adjustments would still be required.

3.4.9.1.   *Discussion*

The report had two important strengths: timeliness and actionability. It appeared in the
same year as the EA became law and provided useful illustrations of practice, for example
how to take the idea of the EA's anticipatory PSED into planning processes. Additionally, it
was brief and clear, making the report accessible. There does not appear to have been
follow-on work to identify the extent it was used by HEPs.

3.4.10.   **Educators' conceptions of student diversity in their classes (Gordon, et al., 2010)**

This phenomenological study of educators in HE (20 Australia, 7 UK, 2 NZ and 1 each in
Canada, Pakistan, South Africa, UAE and USA) examined respondents' attitudes to diversity
in their students, identifying a 'context of teaching' outcome space (matrix), Figure 15.

Figure 15: Outcome space for conceptions of student diversity in teaching and learning [adapted to show levels] (Gordon, et al., 2010, p. 967)			
Pedagogical actions → Aspects of diversity ↓	A: Ignore	B. Compensate	C. Utilise
1. Homogenous	Examples of conceptions		
2. Groups or			
3. Individuals			
4. Comprehensive			

The conceptions of diversity in a pedagogical context identified were (rows):

1. Limited level – Homogenous: Students seen as an assembly, no focus on diversity,
2. Intermediate level – Groups: Students seen as diverse by their group 'affiliations' eg international students, those without a subject matter background,
3. Intermediate level – Individuals: Diversity reflected in terms of individual differences,
4. Broad level – Comprehensive: Diversity between groups and individuals appreciated.

The conceptions of learning and teaching in a student diversity context were (columns):

1. Ignore: Learning and teaching occur with no account being taken of diversity. Students are expected to fit in,
2. Compensate: Diverse needs of students or groups acknowledged and compensated for by pedagogical action,
3. Utilise: Diversity is acknowledged and utilised in pedagogical practice, eg by bringing students' former experiences into field of study.

3.4.10.1.   Discussion

The study acknowledged, somewhat in passing, that responding to disability within a cohort might be of a different nature to responding to other forms of diversity. For example, whilst students of diverse cultural or work experiential backgrounds might be willing to have these aspects brought into the field of study, disabled students might not be similarly willing.

The matrix cells 2B and 3B may equate to the situation in English HEPs where a combination of reasonable adjustments and DSA responds to certain forms of diversity, eg disability - students with dyslexia may sit examinations in a separate room to accommodate for the 25% extra time usually granted to them. However, the model did not identify some of the characteristics of the social model of disability, where barrier removal, ideally inherent in design from the outset, was the objective, not 'compensation' or 'utilisation'. However, it may be a question of terminology, 'compensate' might have implied imply such action rather than a modification 'after the fact'.

The authors acknowledged that educators interpreted the notion of diversity as it related to pedagogical practice in different ways, the corollary being that achieving a common definition was not possible. Hence, the outcome space avoided this difficulty, providing a readily accessible model for categorising educators' responses to diversity.

It could be argued that cell 4C would be the target of HEPs' efforts to achieve Inclusive Teaching and Learning (ITL), although the report did not discuss how their output space might be so used. Nevertheless, by using this space HEPs could potentially plan and track their journey towards ITL.

3.4.11.   Inclusive curriculum design in HE (Morgan & Houghton, 2011)

This comprehensive guide led practitioners from inclusive principles to detailed ideas for operationalising inclusive curriculum design. Before giving specifics, it established a definition of an inclusive curriculum design approach as "taking into account students' educational, cultural and social background and experience as well as the presence of any physical or sensory impairment and their mental well-being" (p. 5). It also stated the objective and rationale for inclusive curriculum design and the report's intended audience.

The guide identified the failings of traditional approaches to inclusion which required "integrating individuals into an existing context and minimising difference between individuals…[which…"localis[ed] the problem within the individual" in response to their "deficit" (pp. 7-8) the medicalised model, see S.3.1. The authors suggested reframing the issue as one of discrimination, with the consequent need to remove barriers and change attitudes to remove disadvantage. They argued that reframing "shifted the focus from remedial interventions responding to the needs of individual or specific groups of students to an approach that anticipated and planned for the entitlements of the evolving student population…[changing] the system not the individual". Although they did not use the term explicitly, these anticipatory actions on behalf of a diverse student body appeared close to the idea of responding to the needs of 'Equity Groups'. Importantly, to achieve that aim "the responsibility [is placed] on staff within institutions and the [academic] subjects to change and adapt their policies and practices not the student" (p. 8).

With the policy and philosophical base established, the guide presented the context for change, the case for an inclusive curriculum design, the principles of curriculum design and how such design could produce a quality outcome. A useful set of generic questions and answers which course designers might ask was supplied covering nine stages in design processes: Aims, Objectives, Learning Outcomes, Academic & Competence Standards, Syllabus, Teaching Methods, Learning Activities, Assessment & Feedback, Teaching & Learning Materials. The authors then provided a chapter describing generic considerations followed by 23 subject-specific guides, followed by 19 pages of references including practical resources.

3.4.11.1. *Discussion*

This guide is the most comprehensive resource of practical operational advice identified in this Review and the nearest thing to a sector-wide user-guide for inclusive curriculum design. It forms a useful companion to May and Bridger (2010) and Thomas (Thomas, 2017), see Ss.3.4.4 and 3.3.10, respectively. Nevertheless, although sponsored by the HEA it made but a single, fleeting reference to Hockings' (2010) ITL definition, see S. 3.4.8, missing a potential opportunity to provide a more integrated approach.

3.4.12. Dyslexia in Higher Education: creating a fully inclusive institution (Mortimore, 2013)

A case study, mixed method design at one HEP explored policy documents, and staff student experiences through focus groups, interviews and questionnaires. Respondents included student support senior management, six Schools' support staff, School of Education academics and support staff, School of Education students. Mortimore adopted Fuller's et al. (2004a), six-stage model for her final analysis of the institution's level of inclusiveness.

Mortimore found that different parts of the institution were progressing at different rates and with differing levels of commitment towards inclusivity:
1. University policy attracted dyslexic students and promoted disability issues' awareness across departments,
2. The institution's Action Plan required individualised provision and demanded systematically trained facilitators,
3. Workload, transparency and role concerns were evident at Disability Representative level at the transition point between student support and academic school, as found elsewhere (Mortimore & Crozier, 2006),
4. Examples of emergent inclusive pedagogy existed,
5. Students openly discussed their dyslexia, contrary to findings elsewhere (Mortimore & Crozier, 2006), although the Mortimore acknowledged the lack of dyslexic students' voice in the research, see Discussion below,
6. Staff, although they had low confidence in their skills, promoted inclusivity and an understanding of dyslexic differences, held positive attitudes to students and were flexible in adapting practice,
7. A legacy medical perspective and disablist deficit model persisted,
8. Staff assumptions about the difficulties dyslexic students might encounter could have underestimated and disempowered students.

3.4.12.1. *Discussion*

A significant weakness in this study was the lack of response from dyslexic students, only 7 of 38 invitees responded to the electronic questionnaire but these were excluded from the results, without rationale. With hindsight a potentially more effective approach might have been to offer multiple, alternative means of participation, even retrospectively once the low

participation rate from dyslexic students was known. Nevertheless, the report gives useful insights into the different rates at which ITL activities progressed across a provider.

3.4.13.   Gibson, S. (2015) 'When rights are not enough: What is? Moving towards new pedagogy for inclusive education within UK universities.' (Gibson, 2015)

Gibson argued that despite the 1980/90s Disability Rights Movement (DRM), with its ideals of equality and social justice, UNESCO's initiative (1994), domestic legislation (SENDA, 2001; EA, 2010) the orchestration of inclusive education in UK HE has failed. She ascribed failure to HE providers being 'disablist', paradoxically presenting themselves outwardly as 'inclusive', adducing policies, statistics or in-house reports as evidence, conforming to the Madgriaga et al. (2011) observation that within a university normalcy "'is equated…with an everyday eugenics, which heralds a non-disabled person without "defects", or impairments, as the ideal norm'", and that "[s]uch a sense of normalcy replicates thinking about the 'non-traditional' student resulting in their continued suppression and marginalisation." A lack of engagement with disabled peopled was ascribed as a root cause of such beliefs about normalcy, their voice is not being heard.

Gibson challenged UK HE to face up to its shortcomings to engage in dialectic which sought-out disabled students' lived experiences, initiated conflict which challenged institutional rigidity of views at a political level so that "[e]ducation…[allows] for difference in order to bring about collective understanding, acceptance and changes to practice and expectations".

3.4.13.1.   Discussion

Gibson's paper was unashamedly political, highlighting that student voices needed to be heard and incorporated into ITL efforts, in this she echoed Charlton's 'battle cry' for disabled people, *Nothing about us, without us!* (Charlton, 2000). However, in the practical world of running an HEP it is hard to imagine any executive management initiating conflict to challenge its own rigidity.

3.4.14.   Responsibility for Learning: An inclusive approach to learning and teaching evaluation in Higher Education (Keane, 2015)

Keane examined a peer and student evaluation process for HE lecturers' teaching, arguing that his qualitative methods provided more developmental and meaningful outcomes, as judged by participants, than typical quantitative research with its bias towards accountability and comparability. The study involved 20 lecturers in eight schools within the Faculty of Science subject to peer-review, two of whose review processes included student feedback and discussion. The study's survey questionnaire investigated:

1. Reasons for requesting a peer review,
2. Strengths and weaknesses of the peer reviews,
3. Outcomes for the lecturers,
4. Outcomes for teaching practice,

5. Possible improvements in subsequent qualitative evaluations,
6. Possible improvement in student pass rate.

The peer review process was not prescriptive but guided by an observation template. Individual lecturers and reviewers met to identify the review's purpose, potential lecturer concerns and the type of feedback sought. Review occurred over 3-5 lessons (of whatever types agreed), interim feedback was discussed, a short report formed the main deliverable. Participating lecturers self-reflected on process and outcome(s). Student feedback comprised two elements, classes were invited by an academic adviser, who briefed on the purpose of the exercise, to provide anonymous feedback via a survey form on what the lecturer should "stop, start, continue" doing. This response was then presented back to students by the academic advisor for discussion.

3.4.14.1.   Discussion

Whatever route English HEPs might take towards ITL academics would need to understand how effective their classes were in delivering it. Keane's method may be one such way, possessing the granularity to understand each lecturer's success, as observed by peers, but perhaps more importantly, as experienced by their students. Keane's student-related methodology possessed three interesting aspects, an unambiguous question, straightforward participation and access to further details via mediated feedback sessions.

However, Keane's qualitative method was possibly time consuming and less trusted, than the quantitative approaches he noted were favoured by many academics. Disappointingly, the study reported inconclusively regarding subsequent improvements in lecturers' mandatory annual quantitative teaching evaluations and their students' grades. There could be multiple reasons for an absence of data in these two areas, but any such absence would likely have supported those who doubted 'meaningful and developmental outcomes' from Keane's approach. However, the lecturers receiving student feedback reported an improved relationship with the class and an opened channel of communication and negotiation.

3.4.15.   Embedding Equality in Discipline Specific Guides (HEA/Advance HE, 2015)

HEA published a set of five short guides (10-20 pages) to help academics embed equality and diversity in their curriculum covering: Art and Design, Classics, Education, Physical Sciences and Social Work. They were intended to be freestanding entities providing contextual background including legislation, a theoretical base, case study-type examples, implementation guidance and concluding remarks. Despite subject specificity, common themes emerged:

1. Change whilst difficult did not equate to impossible, a 'we can' presumption was important,
2. Top-down institutional leadership of the agenda and bottom-up academic involvement required combining in whole department and WI approaches,

3. Evangelising, exemplar champions are needed,
4. 'How to' support and resources are needed,
5. Involvement and communications are vital,
6. Multiple small projects delivering small, measurable improvements work better than monolithic larger ones.

3.4.15.1. *Discussion*

Although these guides appeared rather superficial, possibly excepting the Art and Design Guide and its 17-item checklist of 'should' dos', they offered a 'taster' of how a policy aim could be operationalised at subject level. However, five subject areas constituted a small fraction of academic disciplines, representing a tantalising and frustrating glimpse of what might be achieved. Nevertheless, they illustrated that for providers to succeed in becoming more diverse, equal and diverse they needed to embed attitudinal, behavioural and content change in the curriculum academic by academic at subject level.

3.4.16. Cause of Difference in Student Outcomes (Mountford-Zimdars, et al., 2015) for HEFCE

This HEFCE-commissioned report examined the possible causes for differential outcomes in retention, attainment, progression and graduate, and evaluated HEPs' steps to close outcome gaps for three groups, lower-socio-economic, black and minority ethnic and disabled students. The methodology comprised a literature review of published and unpublished sources, interviews with HE stakeholders and employers, reviews of international studies and in-depth case study research at nine English HEPs.

The research elucidated an analytical model identifying influences on outcomes operating at three levels and comprising four categories of explanatory factors:
Levels:
1. Macro - the wider context of learning,
2. Meso - individual HEPs and related structures,
3. Micro – communication, including day-to-day interactions, between individual students and staff in the HE environment.

Factors:
1. Curricula and learning, teaching and assessment practices: Student groups' differing degrees of satisfaction with the HE curricula, learning, teaching and assessment,
2. Social, cultural and economic capital: Differences in students' experience of HE, their network, external support and financial resources,
3. Relationships between staff and students and between students: Student groups' sense of 'belonging',
4. Psychosocial and identity factors: Students perceived level of support for and encouragement in interacting daily with their institutions and staff.

The report made recommendations in five areas for sectorial and individual HEPs' action:

1. Enhance the evidence base about students,
2. Raise awareness of available resources and share that information,
3. Embed the agenda about closing differentials at all organisational levels,
4. Use staff as change agents,
5. Use students as change agents.

The report proposed, with illustrative examples, that each of these recommendations should be operationalised at three levels, macro, meso and micro.

3.4.16.1.   Discussion

The report's identification of macro, meso and micro actions to reduce differential outcomes is a useful framework differentiating between exogenous influences (macro) and endogenous influences (meso and micro) allowing clear visibility of what could happen nationally and what HEPs could achieve for themselves, in a coherent, potentially integrated approach, combining sector-wide and WI approaches. This idea of differentiation in influences (exogenous/endogenous) and levels of action (macro/meso/micro) is used in this research's structural analysis, see S.6.2.

Unfortunately, the report disappoints in a crucial respect. In three of the five areas of recommendations it proposed no micro level actions: awareness and information sharing, embedding the agenda and staff as change agents. What the report promised but only partially delivered were reasonably detailed operationalising actions, something HEPs Access Agreements would not have contained. In a sense the report was self-contradictory, commenting on the utility of a WI approach but not fully including guidance to achieve that wholeness.

3.4.17.   Listening to the voice of dyslexic students at a small, vocational HE institution to promote successful inclusive practice in the 21st century (Webster, 2016)

Rather than investigating general difficulties experienced by 43 dyslexic students this mixed methods, single institution study asked simply "what lecturers do that helps them in the learning environment...and what they find difficult".

Just under half commented on lecturers' lack of awareness of individual student's dyslexia. They felt that some basic functional aspects of lecturing gave them problems, spoken delivery too fast, lecture slides changed too quickly, unwillingness to repeat information or explain topics in different ways, un-differentiated content (key words/concepts not highlighted) and slides overloaded.

Single methods of information transfer caused disengagement whereas class participation, in-class quizzes and interactive group work maintained their interest. Some lecturers were unapproachable, respondents felt afraid to talk to them. Additionally, they did not always want to draw attention themselves, nor to be pitied, see Oliver (1990) "personal tragedy theory of disability" regarding this response. Respondents felt that technology could be

useful but wanted more refresher sessions, however, they felt that being the only ones using technology in lectures could be stigmatising. Books available electronically were unpopular, formats sometimes being difficult to read. Timed assessments caused great anxiety, placing stress on respondents' comprehension, organisational, syntactical, memory and expressive abilities, capabilities affected by dyslexia and worsened by pressure. Practically all reported poor prior educational experiences due to dyslexia including bullying by teachers and peers.

Webster recommended:
1. Lecturers provide opportunities for overlearning – multiple sessions and multisensory; the HEP providing necessary extra resources,
2. Workshops comprising lecturers and students to teach lecturers about difficulties disabled students face,
3. Opportunities for individual students to tell lecturers about their own specific needs,
4. Extra time to be given to lecturers to tailor/develop modules to include video, diagrams and relevant hyperlinks,
5. With students, examine the way Assistive Technology (AT) can be available for all, avoiding stigmatisation.

3.4.17.1.   *Discussion:*

This is a useful paper as it investigates the actual point of knowledge transfer, which, whatever the wider purpose of HE, is a crucial element in its achievement. Whilst none of the findings nor recommendations could be called 'rocket science' unless students themselves are asked lecturers might not know the issues their delivery causes, highlighting the importance of listening to the student voice continuously.

3.4.18.   Inclusive Teaching Code of Practice (King's College London, 2016)

The King's Inclusive Teaching Code of Practice, part of the King's Learning Institute's generic support, provided 14 core competencies to help academics understand how to be an Inclusive-Practice Educator, giving "clear goals and understanding of the role". The competencies were: attitude, treatment, language, communication, cultural awareness, openness, accessible contact, respect, referencing, collaboration, flexibility, versatility, curriculum, assessment. Each competency's description outlined the contributing issues before providing guidance to meet those.

The audit tool provided King's academics with three elements:
1. Rationale for inclusive education, and typical difficulties associated with its achievement,
2. Ideas for developing a clearer understanding of inclusivity within recipients' curricula,
3. A toolkit to provide evidence for inclusive practices being delivered.

Building on extant practice, the toolkit linked to Trinity College Dublin's *Trinity Inclusive Curriculum* (TIC) website and the various tools therein (Trinity College Dublin, 2017). Trinity's approach was based on the tenets of UDL, specifically identifying:

1. Flexibility and variety in teaching and assessment methods, and teaching materials,
2. Providing accessible and timely programme requirements to allow adequate preparation,
3. Providing accessible course materials available on time to allow optimal participation.

3.4.18.1. *Discussion*

Although these two resources provided many practical ideas for academics neither suggested that knowledge of the difficulties faced by specific group of students, Equity Groups, would be useful in determining whether those Groups felt their needs were being met. There appears to have been an assumption that providing any alternative approach must, merely by being alternative, help deliver inclusive teaching. However, Wray and Quinn (2017), immediately below, provided an approach where explicit questions were asked to avoid making any assumption that any alternative meant better.

3.4.19. Inclusive Learning, Teaching and Assessment Framework (Wray & Quinn, 2017)

Wray and Quinn (2017) described a straightforward six-page self-rating tool, based on Sheffield Hallam University's (Chantler, et al., 2009), which asked Subject Directors to submit assessments of the inclusivity of their subject's teaching, assessment and quality assurance. In each category, the tool stated six or seven "indicative good practices" before asking for details of current practice and posing three questions regarding the extent to which the good practice occurred currently within their subject, with a requirement to identify action points.

3.4.19.1. *Discussion*

The document, and process it described, is important as it concerns operationalising inclusive practice, explicitly requiring course managers to:
1. Rate their inclusivity against concrete examples of good practice,
2. Make their judgements over four elements of course delivery,
3. Review the way academic staff delivered course material,
4. Integrate pedagogy (course delivery) with individuals' learning support (additional support as identified in Learning Support Plans, typically at least part funded by DSA)
5. Engage disabled students in the good practices described.

3.4.20. Inclusive Teaching & Learning as a Route to Excellence (DSSLG, 2017)

The DSSLG, formed as a sector-led group to support the Modernisation programme and "to drive forward necessary changes across the sector to advise on ways of ensuring the good

practice which has already been developed in many HEPs is spread across the sector" (p. 9) published its *Inclusive Teaching and Learning in HE as a Route to Excellence* in January 2017[13]. The report was structured to offer some policy advice and a small number of operational suggestions. It discussed the drivers for change as being legislation, equity and social justice, the social model of disability and the need for reasonable adjustments. A section discussed how institutional change might be driven. At the policy level it identified benefits of inclusive practice to HEPs plus five institutional risks of not embracing inclusive teaching and learning together with potential mitigating actions. An annex presented three case-study examples of reasonable adjustments.

Draffan et al. (2018) reviewed the report supporting its appearance, its recapitulation of HEPs' obligations under the Equality Act, its introduction of the social model of disability, the role of strategic leadership and its identification of risk to HEPs in not pursuing inclusive teaching. However, they identified several shortcomings by offering suggestions which might have been included:

1. Inclusion of the student voice in strategic and curricula planning,
2. A practitioners' inclusive teaching and learning toolkit such as the *Teaching Essentials Toolkit* (Sheffield Hallam University, n.d.)[14],
3. Importance of taking a WI approach,
4. Guidance in and use of explicit ITL frameworks to build on the UKPSF,
5. Incorporation of ITL in HEPs' own measurement and monitoring activities as well as within the TEF.

They closed by stating, "the sector needed a long-term plan supporting development of "the necessary tools and skills to embed…inclusive practices within the academic and teaching staff communities".

3.4.20.1.   Discussion

The report has the 'feel' of an initial publication, laying foundations for a future series accompanied by sector-led initiatives. With its elucidation of institutional risks, it was clearly aimed at executive management, but its content gave merely a 'taster' of what might be required of HEPs, Draffan et al. usefully identified some important omissions. However useful the report might have been, there were no public domain follow-on publications nor sector initiatives. Additionally, it appeared too late to help HEPs prepare for the Modernisation's changes, live from AY2016/17. For whatever reason, an opportunity seems to have been lost and its contributors collective experience left untapped by the sector.

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[13] DSSLG was subsumed into the Commission for Disabled Students in June 2019 https://www.officeforstudents.org.uk/media/d46469d8-f3f3-410e-95c4-201a1a5d16b6/dsc-information-pack-for-commissioners.pdf

[14] Sheffield Hallam also provided links to several other similar guides https://blogs.shu.ac.uk/ip/applied-practice/inclusive-practice-guides/?doing_wp_cron=1587619778.2477359771728515625000

3.4.21.   Diversity and Inclusion SEDA Special (SEDA, 2018)

The Staff and Educational Development Association (SEDA) published *Diversity and Inclusion Special* (2018), a valuable compendium of domestic and international expertise regarding curricula, learning and assessment practices together with psychosocial and identity factors as they relate to diversity and inclusion. It used Mountford-Zimdars' research, *Causes of differences in student outcome* (2015), as the context for the Special, noting that the English undergraduate cohort in AY2016/17 was significantly diverse with:
1. Over 500,000 part-time students,
2. 40,000 students declaring a disability, half with a learning disability and increasing mental health conditions,
3. Of new undergraduates, some 155,585 (28%) were Black, Minority Ethnic (BME).

[AY2016/17 English domiciled entrants at all levels, all modes of study totalled 635,020 and English domiciled all levels, all years totalled 1,528,030 (HESA, 2016a)]

The Special's extensive content spanned three categories, institutional context, international snapshots and dimensions of diversity, and was placed in the context of:
1. Tinto's observation "Access without success is no opportunity" (2008) and the need to address the whole student lifecycle,
2. WP being driven by the combination of economic and social justice rationales,
3. Attainment gaps appearing stubbornly resistant to reduction.

Three papers are selected on the basis of relevance for inclusion in this review:

3.4.22.   Addressing the attainment gap: Questions for developing an institutional approach (Weller, 2018)

Weller addressed the attainment gap of BME students. Despite higher participation rates in 18-21-year-old undergraduates' success rates showed a negative 15% gap in achieving upper second or first class degrees compared to non-BME students. The attainment gap between black and white students was starker at 26% points (Sanders & Rose-Adams, 2014) and (Equality Challenge Unit, 2016) in (Weller, 2018, p. 11). She commented that institutions' realisation that causes of attainment gaps were multi-factorial led them increasingly to adopt a WI approach, a major challenge being to find ways to connect institution policy to local practice in meaningful ways. She observed that initiatives to reduce the gap can themselves be contentious, despite the existence of important change drivers. Student engagement was the mechanism recommended to drive the case for change as sector as institution and course-level data may provide insufficient impetus.

Weller recounted a London-based university's 3-step approach to closing its BME student attainment gap:
1. Embed equality and diversity within academic QA systems and academic promotion mechanisms, make gap reduction a Key Performance Indicator (KPI),

2. Enhance relevant staff knowledge and skills through individual and team development,

3. Develop student peer mentoring support, build capacity for staff-student partnership.

Implementing any change, Weller noted, can be top-down, bottom up or mixed, which latter was recommended as a three-level approach:

1. Strategic level, institutional commitment to provide cohesion,

2. Collaborative level course team delivery,

3. Individual-level focus to support staff in developing their teaching and students their learning behaviours.

Using her home institution, 43% of all students and 28% of home students were categorised as BME, 50% as EU or international. An overall attainment gap of 20% existed between home BME and non-BME students, ranging between 8-25% across disciplines and schools. The institution had committed to reduce its attainment gap since 2009 eliminating it by 2022.

The programme addressed:

1. The type of leadership needed to support the implied level of institutional change,

2. How to map initiatives' baselines and outcomes showing how they contributed to the overall strategy,

3. Comprehensive identification of key stakeholders using concept mapping,

4. Ways to scale-up local initiatives into institutional ones, using Carless' method (Carless, 2017), itself based on Coburn's four dimensions for conceptualising scaling - up educational change: spread, depth, sustainability and shifts in ownership (Coburn, 2003).

To attain the changes' sustainability, Weller stressed the importance of:

1. Building cross-organisation communities of practice, sharing beliefs which become the new organisational culture,

2. Planning phases being used to communicate strategies,

3. Maintaining longitudinal data as evidence of achievement,

4. Devolving the vision and ownership so that they become deeply embedded,

5. All parts of the institution participate in making change and are measured accordingly,

6. Measures of success must go beyond the quantitative.

Weller's "top ideas for planning an institutional attainment strategy" were:

1. Senior management provide the leadership and plan for the leadership which will be needed as the initiative is devolved,

2. Think beyond the obvious places that impact on student attainment,

3. Use the scaling up of local initiatives to establish new norms of behaviour and inclusive practice,

4. Plan from the outset how to evaluate and evidence impacts,
5. Accept that change is challenging; debate, resistance and alienation are the norm.

3.4.22.1.   Discussion

Weller addressed the achievement of organisational change, acknowledging that to eliminate the attainment gap required the whole organisation to change. Culture change was a central part of the institution's strategy which whilst it could not be imposed top-down, senior management could influence its trajectory. Achieving organisational culture change required diffusion across vertical management and subject structures.

Weller's study illustrated many of May and Bridger's (2010) findings in their 10-HEP project, providing independent, albeit single institution, triangulation.

Weller's three-level analysis influenced this research's concluding analysis, see S.6.2

3.4.23.   Charter Marks for supporting quality: The context of Athena Senior Women's Academic Network (Athena SWAN) and the Race Equality Charter Mark through a case study of King's College London (Epstein, 2018)

Epstein reported on implementing the Race Equality Charter Mark in AY2014/15, praising such Marks as providing clear guidance in and levers for change at an institution. Athena SWAN, which addresses women's under-representation and achievement in Science, technology, Engineering, Mathematics and Medicines (STEMM) subjects launched in 2005 (Advance HE, n.d.d). Awards work at three levels: Bronze institutions possess robust three-year action plans, Silver institutions can demonstrate actions' impacts over several areas, in Gold institutions impacts are demonstrated over most areas.

Epstein suggested 10 key elements to a successful submission:
1. Establish a self-assessment team comprising cross-institution representation.
2. Raise awareness in staff and students to prepare them for future participation.
3. Raise awareness amongst senior managers.
4. Pull together disparate datasets.
5. Host staff/student, BME targeted surveys.
6. Host staff/student focus groups to follow-up on survey results.
7. Involve staff/students in analysing and identifying findings and potential actions.
8. Write up submission, including an action plan.
9. Consult on submissions and action plan with those who will implement.
10. Gain governance approval.

An important element in gaining student participation was involving BME student researchers in student awareness-raising and focus group management, whilst staff

participation benefitted from holding cross-institution engagement meetings with senior managers. After receipt of the Bronze award[15], the project:

1. Ran unconscious bias workshop for senior staff,
2. Piloted a mentoring scheme for BME students,
3. Celebrated BME achievement around the institution,
4. Drew-up a plan to revise recruitment and selection using latest good practice,
5. Created an online staff resource bank,
6. Planned video training resources and a knowledge sharing platform, added more resources to the inclusive teaching training kit,
7. Incorporated learning technologist advice into developing new course materials and CPD,
8. Continued gathering student feedback.

3.4.23.1. *Discussion*

Students, the ultimate beneficiaries of the project, were engaged heavily before, during and after the project both in providing base data regarding their 'take' on the nature of the attainment gap, but also actively in the execution of the project. Cross-institutional collaboration was also a significant component. Arguably, by such a WI approach, the achievement of the Charter Mark helped change the whole organisation's culture by the whole organisation's involvement.

In a disappointing postscript, Epstein noted that a 2018 corporate restructuring closed the King's Learning Institute, reorganised the Diversity and Inclusion Team and abolished the Diversity and Inclusion Manager role.

3.4.24. Inclusive Education (Ross, 2018)

Ross offered tips on implementing inclusive practice. Whilst not claiming exhaustiveness or it being a 'silver bullet', his main recommendation for successful implementation was to take small steps based on student feedback. Ross commented that the 2014 DSA changes (p. 23):

> "…enabled practitioners and the education sector the opportunity to reconsider how teaching can be enhanced to support all students…inclusiveness is just that – an overarching approach to empower all"

Citing Ambrose et al. (2010) he noted that however academics decided to address, or not, inclusive teaching, "students cannot check [leave] their cultural identities at the door…nor transcend their current level of development", which holds good for disabilities, they too cannot be left at the door.

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[15] As at October 2019, King's had received one of only 12 Bronze-level REC awards amongst 6 participating institutions, no Silver or Gold-levels had been awarded (Advance HE, 2019b).

Ross's early work as Inclusive Learning and Teaching Officer included a staff/student survey highlighting willingness to change but a need for tools to achieve this, eg centrally-based resources including tips and practical guides, and training. Survey findings suggested two categories of barriers to operationalisation:

1. Institution-level:
   a. Insufficient resources,
   b. Training availability,
   c. Large class size,
   d. Professional programme constraints [eg fitness to practice].
2. Individual academic-level:
   a. Time,
   b. Resistance from colleagues and/or insufficient influence,
   c. Balancing responsibilities,
   d. Discipline or programme-specific requirements,
   e. Lack of knowledge of resource availability,
   f. Difficulty applying current resources.

Ross's project delivered multiple 'venues' for disseminating knowledge of and tools for implementing inclusive teaching, eg:

1. Departmental events showcasing good practices and fostered debate,
2. Ensuring faculty level figurehead and departments to 'front' initiatives,
3. Developing departmental champions/advocates to showcase successful projects,
4. Holding a multiplicity of promotional events across the institution,
5. Building word-of-mouth momentum.

3.4.24.1. *Discussion*

Ross provided insight into a bottom-up, little and often approach where awareness, issues, ideas, progress and successes were driven by individuals but coordinated through his role, one of facilitator. Academics' desire to participate in initiatives was raised by champions being exemplars of ideas and achievements, honesty about issues, holding information events and celebration of successes.

In the same disappointing postscript as Epstein's, see S.3.4.23.1 , Ross's role, and the department of which he was a part, disappeared in a reorganisation, highlighting the fragility of the place of inclusive teaching in HEPs, see also Study 3 in this research S.5.3.3.2.

3.4.25. Inclusive Teaching and Learning Conclusions

Nationally and internationally ITL has been on HEPs' agenda as a way of operationalising WP for over two decades. In England initiatives were supported by HEFCE, numerous of its reports offered support in policy formulation and structuring WI approaches, case study examples and advice on operationalisation including monitoring, together with HEA's initiatives. There seems to have been ample information available upon which HEPs could

draw to develop their ITL development programmes. However, in two areas guidance seems largely to have been absent, continuous sector-led leadership and the nature and extent of training for academics in the day-to-day delivery of ITL, although the need for training academic by academic at subject level was identified by HEA (HEA/Advance HE, 2015). In a third area, that of listening to the students' voice was repeated several times in contexts which suggested that perhaps it was neither being heard nor being used in a continuous feedback process. A further notable lack was that of transparency. There appeared no mechanism by which students could assess the inclusivity of their providers, whether in making their choice prior to application or once they were students. For example, an equivalent of the Athena SWAN and Race Equality Charter Marks did not, and still does not exist for ITL, nor does the TEF offer objective guidance regarding ITL.

4. Methodology

4.1.   Overview

Saunders et al. (2019) suggested research is a journey, with inevitable direction changes as the route and conditions dictate; this research certainly conformed to this analogy. In studying the Modernisation of the Disabled Students' Allowances (DSA) in England between 2014-2018, the initial goal was to understand its implementation viewed through the lens of inclusive teaching and learning (ITL), by the people tasked with 'on the ground' delivery – Higher Education Providers (HEPs) and Non-Medical Help (NMH) providers. Following Kidder's (1981) lead, respondents were asked to talk descriptively about their own experiences, their stories of a sector characterised by its diverse, multi-party nature in an era of dichotomy, one of financial austerity and simultaneous Widening Participation (WP) in HE. With data 'coming in' and Kepner and Tregoe's (1981, 1997) problem solving philosophy as a guide, a question suggested itself, "Might some of the Modernisation's unintended outcomes, which respondents identified, be amenable to something like a Problem Analysis to explain the 'Why?' of those outcomes?". In reaching the further goal of offering recommendations regarding achieving greater ITL for disabled students in English HE, Kuhn's ideas about breakthrough moments and the need to be radical to identify a new paradigm were a significant influence. Together, these ideas form the methodology's 'onion' to be 'peeled away' using Saunders et al. (2019, pp. 130, 174) as a pragmatic analytical model for understanding the project methodology, Figure 16 and subsequent discussion:

Figure 16: Research Onion (Saunders, et al., 2019, pp. 130, 174)
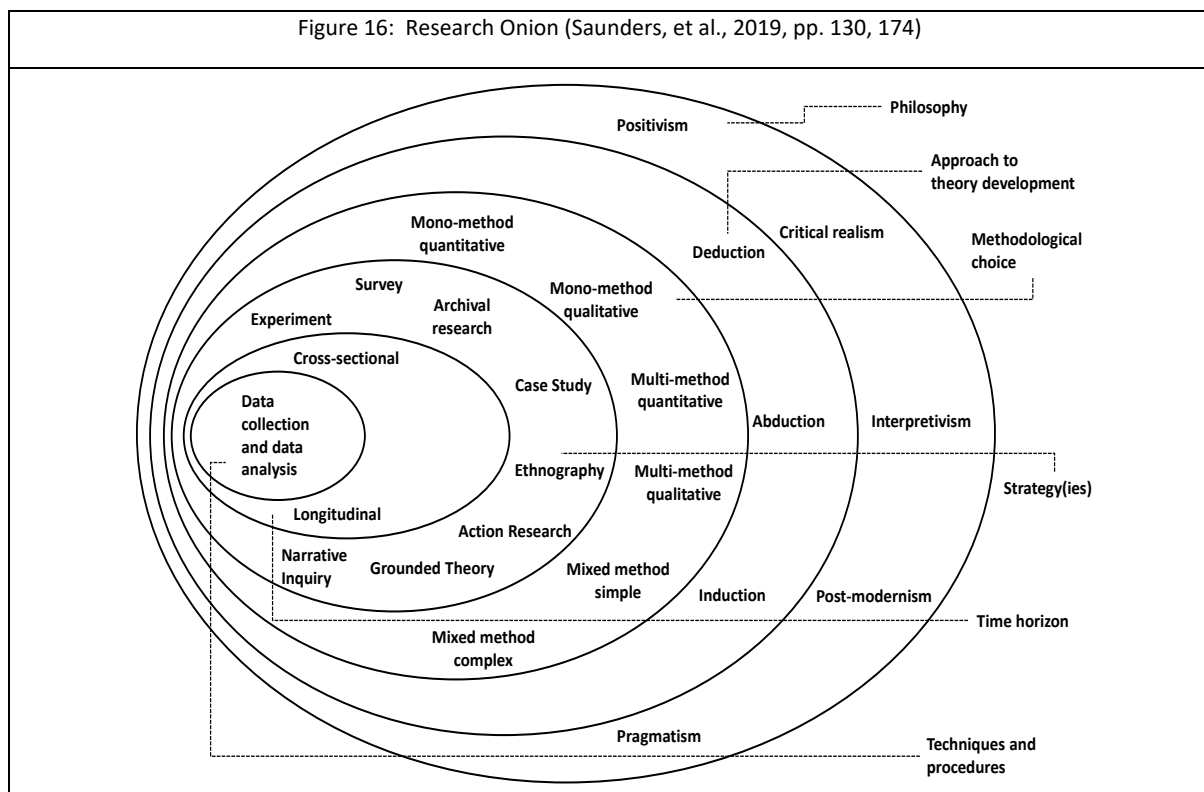
4.2. Philosophy and theory development - ontological positions

4.2.1. Interpretivism

Respondents' stories recounted 'what it was like for them' and were therefore qualitative, subjective and socially constructed, with each person experiencing their own 'reality'. These stories described respondents' everyday lived experiences resulting from the Modernisation, ITL and WP, containing opinions regarding right and wrong, order and disorder, intended and unintended outcomes. That lived experience meant the data were subjective and phenomenological in nature and amenable to an interpretivist analysis (Saunders, et al., 2019, p. 145).

Additionally, HEPs were asked, via two Freedom of Information Requests (FOIR), to provide factual data regarding their use of certain Higher Education Funding Council for England (HEFCE) funding, the Disability Premium, funds generally in support of disabled students and details of their inclusive practices. These FOIRs yielded both quantitative data and rich qualitative explanatory narrative, these latter constituting social facts amenable to an interpretivist approach (Durkheim, 1938).

4.2.2. Critical Realism

As the qualitative data accumulated and analysis progressed, interactions between elements of the Modernisation, ITL and WP revealed themselves. To understand these interactions required sector-wide information, quantitative in its native form, eg statistical returns, or the result of asking for factual data in a sector-wide request, ie two further FOIRs to HEFCE/Office for Fair Access (OFFA) and OfS. To supplement their 'stories' respondents were also asked to respond with more factual information, which although not numerical *per se* was based on known numeric information, eg "Comparing current year to prior year has your flow of new students been more/same/less?" These quantitative data could be considered as being part of an objectivist world, having a universal reality beyond individuals' opinions.

Saunders et al. (2019, pp. 144-145) identified that Critical Realism can reveal causal mechanisms. In this research, these latter were not revealed by looking at either the quantitative or qualitative data in isolation, they needed to be combined. This was achieved by applying Critical Realism to information about the social actors, "individuals or groups, who through their actions, have the capacity to shape their world…" (2019, p. 817), and the quantitative data to reveal potential causality, as discussed in this research's concluding section, eg between Government policies and HEPs' responses, see S.6.1. However, Critical Realism did not seem 'to go far enough' in providing a mechanism for ordering the multi-layered picture which emerged from the analyses, the lens of Pragmatism was needed.

4.2.3.   Systems Theory as tool within Pragmatism

Ordering the multi-layered picture drew on Pragmatism's ontological position of looking at the "flux of processes, experiences and practices", its focus on "problems [and] problem solving" and its "search for practical solutions" (Saunders, et al., 2019, p. 145). This ordering helped place the multiple different actors into a framework and identify potential causal links. Drawing upon problem solving methodology, which identifies potential contributory causes and their linkages and the associated approach of Decision Analysis (Kepner & Tregoe, 1981, 1997), led to the adoption of Systems Thinking in this research, an approach allied to Organisation Theory, both in turn based on Boulding (1956) in (Jackson, 2009). Betts' (1992, p. 41) succinct summary of systems thinking defined:

1. A system as being a "set of elements that function as a whole to achieve common purpose",
2. An element "as a necessary but not self-sufficient component of a system", and
3. As "characterised by synergy – the whole system being greater than the sum of the parts" (Betts, 1992), where...
4. Relationships among the elements are maintained by an exchange of energy…information in a learning system".

He drew further on the Natural Sciences by suggesting that the amount of energy in a system is fixed, subject to entropy which distributes energy evenly throughout the system and can be either open or closed to new energy. He also discussed ideas of hierarchy (levels) across, homeostasis of (self-regulation to a stable state through feedback) and purposiveness in goals (either shared or conflicting). In examining HE, one might suggest that the 'elements' comprise the Government through the Department for Education (DfE), regulatory bodies, HEPs, sources of training etc. The 'energy' between them might comprise legislative and regulatory requirements, statistical returns, student feedback. The Dimensions of ITL developed in this research's concluding section draw on such systems thinking, see S.6.2.

Systems engineering, within Applied Systems Thinking (AST), "operates in the space between research and business, and assumes the attitudes of both…[and]…formulates the operational, performance and economic objectives, and the broad plan to be followed" (Hall, 1962); (Hall, 1969, 1974) both in (Checkland, 1999, p. 130). Additionally, system engineers "must be capable of predicting the emergent properties of the system…which are possessed by the system but not its parts" (Gosling, 1962) in (Checkland, 1999, p. 129), these emergent properties typically being investigated using prototypes and testing.

Although Betts was building single entities, ie he researched individual schools, other systems thinkers have looked at education as a sector, for example Scott (2013) discussed using the tenets of organisation theory. Jackson's (2009) review of *Fifty years of systems thinking for management*, based on Boulding's hierarchy of complexity, identified AST as

"systems thinking which has as its primary purpose the enhancement of management". AST comprised three types:

1. Functionalist AST imagines that systems have a "unitary goal" for a single client, to which the whole needs to be aligned. It proceeds by examining the nature of the parts of the system, their interrelationships and the system's relationship with its environment,

2. Structuralist AST also assumes a unitary system goal for a single client but looks beneath the surface of the system to understand what is going wrong with the components and to manipulate design features to correct the problems,

3. Interpretive AST, contrastingly, assumes multiple stakeholders, customers or problem owners, possessed of differing goals where the system objective is to ensure "sufficient accommodation" between conflicting requirements of the parts such as to achieve change.

Interpretative AST has been developed further into 'whole systems working', "the process of involving all stakeholders of a domain in discussions about service change – all parties are encouraged to think about the way the whole service delivery system works, rather than focusing only upon their own service" (Hudson, 2006)[16] in (Jackson, 2009, p. 30). Dunnion and Donovan (2014) applied such ideas to solve an HEP's issues with its admissions processes. They demonstrated through pilot projects that a systems thinking approach which placed students' needs at the heart of the design of a new process far outstripped the performance of the existing method's 'command and control' approach. Work at further HEPs confirmed the prevalence of 'command and control' in the sector. Parenthetically, they discuss the distorting nature and ineffectiveness of the National Student Survey (NSS) to measure and understand student satisfaction.

AST and its derivatives appear to belong to a pragmatist approach, where "research starts with a problem, and aims to contribute practical solutions that inform future practice" (Saunders, et al., 2019, pp. 145, 151); this research acknowledges the "[c]omplex, rich external 'Reality'" implicit in the multi-element nature of HE and seeks, therefore, multiple perspectives on the investigation in hand concerning the Modernisation programme and ITL.

To develop a pragmatic view using interpretivist AST required a move away from inductive to abductive thinking which has the potential to "best explain" the relationships and hence reveal possible cause and effects between elements in the HE 'system' (Stanford Encyclopedia of Philosophy, 2017). Feilzer (2010) offered useful justification for using mixed methods within a pragmatism research paradigm, with consequent different modes of analysis, in multiple iterations of abductive reasoning. These cycles result in plausible,

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[16] Care Service Improvement Partnership was absorbed into the UK Department of Health wef 1/12/2008. https://www.thinklocalactpersonal.org.uk/News/Care-Services-Improvement-Partnership-will-cease-to-exist-as-a-separate-identity/

indeed testable cause and effect relationships. She argued, that positivist, realist and interpretative philosophies imprison researchers into seeing the world only through those particular lenses (Robson , 1993), fulfilling Kuhn's definition of a paradigm as an "accepted model or pattern" which is intolerant to new theories (Kuhn, 1962/2012, pp. 23-24), whereas pragmatism frees researchers to "solve practical problems in the 'real world'" (Feilzer, 2010, p. 8). This research seeks to understand the relationships, causal and otherwise, between DSAs and ITL, certainly a 'problem in the real world'. The tangible outcome of that move to abductive thinking and pragmatism is to use a graphical approach to construct a conceptual model, Dimensions of ITL, in the concluding section, see S.6.2 (Saunders, et al., 2019, pp. 155-156).

4.2.4.   Visualising a Conceptual Model

Graphical representation is commended as a powerful tool in identifying a system's operation or a problem's cause, leading to conceptual models which reflect the important characteristics of whatever is being investigated (Cameron, 2016, pp. 324-339); (Bovée & Thil, 2020, p. 275); (Checkland, 1999, pp. A17-A30). A model is an "explicit interpretation of one's understanding of a situation….a description of the entities, processes or attributes and the relationships between them" (Wilson, 1990). Ackoff (1962) identified three forms of conceptual model:

1. Iconic: Model is a miniature representation,
2. Analogic: Model has a different physical appearance,
3. Analytic: Model represented mathematically.

Wilson (1990, p. 11) identified a fourth which used pictorial symbols, used in this research. Hence, the final section adopts a pragmatist, whole systems approach to present this research as a series of schematics. These illustrate the multiple Dimensions, ie the influences at work within and inter-relationships across the multiple elements of the English HE sector's operationalisation of ITL, see S.6.2.

Note, in systems theory 'parlance' the HE sector defines the systems 'boundary', the elements are 'objects' which are ordered into a 'structure' and the inter-relationships constitute its 'behaviour' (Wilson, 1990); (Checkland, 1999). The schematics partially use the conventions of systems thinking diagramming, they are structural, closed loop diagrams illustrating both linear flow and feedback loops, however they do not attempt a comprehensive systems thinking diagrammatic analysis, see Kim (1999) for an accessible, short introduction to the subject.

4.2.5.   Summary: Philosophy and approach to theory development

This study uses an overall interpretivist approach within which it uses critical realism and pragmatism and AST to yield a whole system understanding, Figure 17.

Figure 17: Summary of this research's ontological and epistemological positioning
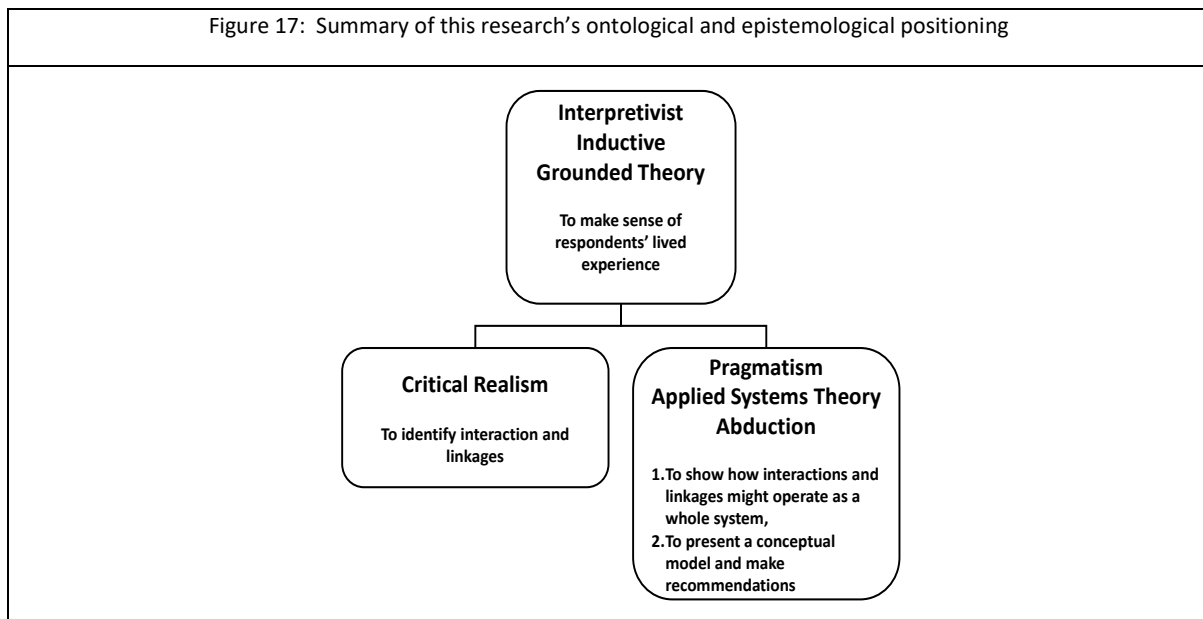
4.3. Methodological Choice

The research commenced and proceeded as an enquiry, the sequence of which might be described as "drilling down" towards an understanding, as each study revealed an aspect of 'reality', a further stratum needed exploration to achieve better understanding. That understanding was revealed by listening to the everyday lived experiences of social actors within the sector, deriving purely qualitative data within which were embedded references to events and actions elsewhere in the sector, beyond individuals' detailed knowledge. Some of those events and actions were subsequently revealed through Freedom of Information Requests (FOIR). The social actors also provided quantitative information, and further quantitative data was obtained through statistical reports, supplied by the Higher Education Statistics Agency (HESA) as well as through FOIRs. This research's 'drilling down process' might best be described as 'multi-methods, complex', a category missing from the Saunders et al. 'research onion', Figure 16 (2019, pp. 130, 174).

4.3.1. Research strategies

To translate an interpretivist philosophy into a workable research strategy Grounded Theory (Glaser & Strauss, 1967) appeared to offer an effective ontological fit by allowing respondents' stories to reveal the 'social phenomena' that exercised an extrinsic influence on them, following Durkheim's ideas that such phenomena constitute 'social facts', analogous to 'facts' revealed by classical positivist research (Durkheim, 1938). In such a phenomenological approach, data-gathering proceeds via *inter alia* seeking understanding through qualitative methods, eg in depth interviewing to yield descriptive data which ultimately leads to understanding of the phenomena from each actor's own perspective, the world as they experienced it. Taylor and Bogdan's work on Glaser & Strauss's 'classical'

Grounded Theory offered eight characteristics regarding qualitative research, which were adopted in the research design (Taylor & Bogdan, 1984, pp. 5-7):

1. "[It is] inductive…",
2. "[T]he researcher looks at settings and people holistically…",
3. "[R]esearchers are sensitive to their effects on the people they study…",
4. "[R]esearchers try to understand people from their own frame of reference….",
5. "[R]esearchers suspend, or set aside, their own beliefs, perspectives, and predispositions…",
6. [A]ll perspectives are valuable…[seeking] not "truth" or "morality" but…other people's perspectives…",
7. "[Its] methods are humanistic…",
8. "[It allows] us to stay close to the empirical world (Blumer, 1969)…".

Table 8 shows how Studies1-6 incorporated these characteristics:

Table 8: Design of qualitative research using characteristics of qualitative research (Taylor & Bogdan, 1984, pp. 5-7)	
Characteristic of qualitative research	**How integrated into this research**
1. [It is] inductive.	No initial hypothesis was formulated.
2. Look at settings, people holistically, in context of their past and current situations.	Questionnaires/interviews asked both contextual and time-based questions to evince a rounded picture and its temporal development.
3. [I]n-depth interviewing, they model their interviews after a normal conversation.	The interviews were designed as if talking to a professional colleague at conference or CPD-event.
4. [R]esearchers try to understand people from their own frame of reference…experiencing reality as others experience it.	Questions structured with both a 'fixed' component (eg "To what extent do you agree with the statement…?") as well as free response (eg "Tell me more about what was happening", "How did that feel?").
5. Own beliefs/attitudes set aside. Nothing is taken for granted. Everything is a subject of enquiry.	Questions, qualitative & quantitative, were phrased neutrally. Analyses presented multiple sides to arguments. Journal articles and academic conference presentations 'tested' results against practitioner audiences.
6. [A]ll perspectives are valuable…all people are viewed as equals,"	In analyses, equal weight was attached to respondents' answers irrespective of their position or size of organisation.
7. [H]humanistic, we get to know [people] personally and experience what they experience	Respondents were recruited through professional associations' (of which the researcher was a member) email forums or recommendation; first name terms and informal tone were used during interviews
8. [C]lose to the empirical world [ensuring] close fit between the data and what people actually say and do	Researcher's own professional position allowed verification of respondents' input.

Additionally, a research strategy was used about which the literature seems largely silent, Freedom of Information Requests (FOIRs), see S.4.3.2.5.

4.3.2. Research techniques and procedures

4.3.2.1. Research techniques and procedures: Overview

This research conducted 11 studies, over three academic years, with public bodies and private organisations engaged in the DSA Modernisation, ITL and WP with a specific focus on Specific learning Difficulties (SpLDs). The Modernisation responses primarily concerned NMH providers delivering support and HEPs whose disabled students were being supported. NMH providers could be independent 3rd party suppliers (private organisations) or the HEPs themselves (public bodies). ITL and WP activities concerned HEPs and regulatory and funding bodies, HEFCE, OFFA and OfS. Relevant HESA official data relating to the HE sector was also used.

Table 9 summarises the sources and type of data for this research. Data was gathered from practitioners (eg Heads of Disability Services at English HEPs, NMH support workers) using semi-structured emailed and online questionnaires, semi-structured telephone interviews, and from all 133 English HEPs using two Freedom of Information Requests (FOIRs 1 & 2). Quantitative data in the form of statistical information was derived from public domain documents (HESA). FOIR3 was sent to HEFCE/OFFA in early 2018 and answered by OfS. FOIR4 was initially sent in early 2019, and after refusal was successfully resubmitted in February 2020.

Table 9: Sources and type of data for this research		
Type of respondent	**Nature of data collected**	**Data collection method**
Public bodies		
1. Higher Education Providers (HEPs):		
a. Institutional level, including those managing disabled students support team/departments),	Mixed	Semi-structured questionnaire, FOIRs1 and 2.
b. Those managing implementing inclusive learning environments,	Qualitative	Semi-structured interview.
c. Those registered as NMH support workers.	Mixed	Semi-structured questionnaire.
2. Organisations responsible for funding, regulating and reporting on HEPs' performance:		
a. Higher Education Funding Council for England (HEFCE)/ Office for Fair Access (OFFA), later Office for Students (OfS),	Quantitative	FOIRs3 and 4.
b. Student Loans Company (SLC)	Quantitative Quantitative	FOIR 5. Analysis of public domain data.
3. Higher Education Statistics Agency (HESA).		
Private organisations		
4. NMH providers, including individual NMH support workers	Mixed	Semi-structured questionnaire.

Table 10 provides further detail about this research: chronological information, study objective, data gathering method and time horizon, respondents' type, number responding and the use to which data gathered may have already been put. The introductory section, see S.2, identified that this research was conducted 'in real time', the Modernisation and its effects on inclusive teaching, occurred simultaneously with the research project. As well as needing to source data as the changes took effect, an additional aim of this project was to

'give something back to the sector' to recompense, in some small way, respondents for their time by way of helping the sector understand the effect of the changes. This latter aim inevitably meant that limited sub-sets of the analysis would be placed in the public domain for submissions to Government consultations, to inform industry bodies and for selective publication in recognised academic journals and at academic professional associations' conferences whilst still maintaining the uniqueness of the research as an integrated whole.

No.	Date	Objective	Method & time horizon	Respondents	n	Whether output in public domain
			Table 10: Studies comprising this research and publication status			
1	Sep 2015	Understand the nature of an inclusive learning environment.	Semi-structured emailed questionnaire. Cross-sectional.	Specialist Study Skills tutors, managers in HEP's student wellbeing services.	64	1. Submission to UK Government consultation (BIS, 2015d). 2. Summary published (Newman & Conway, 2016). 3. Informed workshop content (Newman & Conway, 2017a).
2	Jul - Aug 2016	1. Establish baseline of effects of early changes on NMH providers. 2. Investigate use of Remote Working Tools for NMH support delivery.	Semi-structured online questionnaire. Longitudinal with Study 4.	Independent NMH providers, Corporate (agency) NMH providers (not HEPs), HEPs.	73	1. Baseline analysis: Not published. 2. RWT analysis part published (Newman & Conway, 2017b).
3	Dec 2016 – Aug 2017	Identify HEPs' challenges implementing inclusive learning environments.	Two-stage semi-structured telephone interview. Longitudinal.	Individuals with role of "inclusivity officer".	8	Summary published (Newman, 2017).
4	Apr- Jun 2017	Understand effect of changes on NMH providers after 1 year.	Semi-structured online questionnaire. Longitudinal with Study 2.	Members of ADSHE, NADP, PATOSS, ANMHP.	262	Summary circulated confidentially to Boards of the respective organisations.
5	Jun 2017	Understand effect of changes on HEP's disability support functions after 1 year.	Semi-structured online questionnaire. Cross-sectional.	Heads of HEPs disability support services who were members of the NADP.	21	Summary circulated to NADP board.
6	Oct 2017	Understand practitioners' response to DSA-QAG roadshows.	Semi-structured online questionnaire. Cross-sectional.	Attendees at DSA-QAG audit events (members of ADSHE, PATOSS, NADP, ANMHP).	20	Summary findings provided to NADP, PATOSS, ADSHE, ANMHP boards and DSA-QAG Chief Executive.
7	Feb 2018	Understand how HEPs used HEFCE funding aimed at supporting HEPs' progress towards the social model of disability.	FOIR1 ** Cross-sectional. HEFCE statistics. Longitudinal.	All English HEPs.	131	Selective use of 'headline figures' SEDA 2019, SAILS, NADP 2019 conferences. Selective and confidential use in ADSHE response to SLC Tailored Review consultation, Jul-Sep 2019
8	Jun 2018	Understand HEPs definition of, training in and validation of courses against criteria including inclusive teaching.	FOIR2 ** Cross-sectional. HESA statistics. Longitudinal.	All English HEPs.	132	Selective use of certain 'headline' figures at SEDA May 2019, SAILS May2019, NADP June 2019 conferences. Selective use in (Newman & Herbert, 2019)
9	Mar 2018	HEPs' actions to improve inclusivity of teaching and learning (AY2016/17).	FOIR3 ** Cross-sectional.	HEFCE (later OfS) data returns.	133	Selective use of certain 'headline' figures in (Newman & Conway, 2019).
10	Mar 2019	HEPs' actions to improve inclusivity of teaching and learning (AY2016/17).	FOIR4 ** Cross-sectional.	OfS data returns.	133	None.
11	Apr 2019	Number of SpLD first diagnoses after entering HE	FOIR5. Cross sectional	Student Loans Company (SLC)	133	None. Freedom of Information Act (2000) Section 12 exemption issued. Data unavailable.

**Note: Studies 7-10 are combined in "Assessing the extent of inclusive teaching in English HEPs" within S.5.7.

4.3.2.2.   Research techniques and procedures: Sampling

In this research data was sought from five known, definable and finite populations. Purposive sampling rather than probability sampling was therefore more appropriate. The following list identifies each and the study in which they participated:

1. NMH support providers. Studies 1, 2, 4 and 6
2. NMH support workers working for NMH providers, which in the case of sole traders would be themselves. Studies 1, 2, 4 and 6,
3. Managers of whole or parts of HEPs' inclusivity projects. Study 3,
4. HEPs' Heads of Disability Services. Study 5,
5. HEPs' managements, either directly or indirectly. Studies 7-8 (FOIRs1 and 2) and 9-10 (FOIRs3 and 4), respectively.

Accessing these populations for studies 1-2 and 4-6 was facilitated by their membership of professional organisations which used the Jiscmail[17] platform to host their discussion fora. As a member of these associations the researcher was able to post invitations to participate in this research. Study 3's population was harder to access, hence a different purposive approach was used, that of snowball sampling, see that Study's description for further details, S.4.4.3.1. For studies 7-10, a whole population census approach was taken, using FOIRs sent to all 133 English HEPs (excluding Further Education Colleges (FECs)) listed by HEFCE and later OfS (OfS, 2020a).

4.3.2.3.   Research techniques and procedures: Data collection

For part of its data collection this research used an extant sector model for guidance. A number of HEFCE-sponsored research reports relating to the support of disabled students, WP and ITL had used a mixed methods approach, for example by initially using questionnaires to provide insights into sector-wide characteristics, usually quantitative in nature followed by interviews with selected providers, yielding rich narrative data. (Williams, et al., 2017); (Williams, et al., 2019); (HEFCE, 2009); (HEFCE, 2016a). Due to the sector's familiarity with this model, it was adopted and adapted in this research's sub-studies involving NMH providers and HEP Heads of Disability Services.

Online, semi-structured questionnaires were used to gather quantitative data, both factual and opinion-based, which were subsequently used to inform the concluding structural analysis, see S.6.2. These questionnaires comprised two parts, a fixed element which required some form of rating, typically based on a neutrally phrased question with associated Likert scale to ascertain respondents' intensity of agreement or disagreement (Bryman, 2012, p. 12) followed by free-narrative inviting respondents to contribute additional contextual information, 'their stories' with requests such as, "Please provide context for your answer". This approach drew on the mixed method used by Madriaga et al.

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[17] JiscMail is the national academic mailing list service, provided by the Joint Information Systems Committee (Jisc). See Glossary for further information.

(2010) in their *Confronting similar challenges?* study where they accompanied questions seeking quantitative data with supplementary questions seeking additional, narrative, information. Their approach was also broadly based on Grounded Theory and attempted to bring together recurring themes (Charmaz, 2014).

The survey software selected was provided by Bristol University Survey (BOS) which later became part of Jisc as Online Surveys[18]. Selection was based on the triple pragmatic ground of cost (nil), availability (the home institution possessed a subscription) and it was an established method in the sector. In usage it was found to be straightforward and well-featured.

Semi-structured telephone interviews, in Study 3, preceded by email receipt of guiding questions, gave 'space' for respondents to answer specific questions. Additionally, respondents were asked to supplement their answers with background and context, 'their stories'. Respondents' oral responses were recorded using Sonocent Audio Notetaker, transcribed manually by the researcher, in a 2-pass approach, transcription then and subsequent verification of the resultant transcript against original recording with corrections made as appropriate to yield a faithful record. Quantitative data from the online questionnaires was extracted automatically through the survey software into Excel.

4.3.2.4. Research techniques and procedures: Analysing qualitative data

Narrative data, produced by questionnaire or interview, was examined manually in a process of thematic analysis, "a method for identifying, analysing, and reporting patterns (themes) within data" (Braun & Clarke, 2006) in a multi-step process (Bryman, 2012); (Charmaz, 2014). Responses were read to produce an initial 'superlist' of themes, which were captured in an Excel spreadsheet. This superlist was then reviewed to identify common themes which were again captured within Excel. This reduced list was further reviewed to yield a more manageable list. The resultant list of themes was then cross referenced to the actual words used by respondents so that quotations could illustrate the themes, allowing the results to 'live' for the reader in respondents' own words, somewhat reflecting the flexibility Braun & Clarke (2006, p. 4) ascribed to thematic analysis.

An automated approach to thematic analysis, such as using NVIVO software (NVIVO, n.d.), was investigated but it was felt that the multiple ways in which respondents talked about the same theme would limit its utility. Nevertheless, NVIVO might have been useful as an aid to navigating the considerable volume of narrative data (Dollah, et al., 2017). Additionally, the researcher's preference was to gain familiarity with respondents' views by reading and 'handling' their narrative multiple times. Using an automated approach would by its nature reduce the need and opportunity to do this and so was rejected.

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[18] www.onlinesurveys.ac.uk

4.3.2.5.　　Research techniques and procedures: Using Freedom of Information Requests (FOIRs)

See S.18 Appendix 12 for the verbatim FOIRs.

FOIRs oblige UK public bodies to supply previously unpublished information, subject to certain specified exemptions, within 20 working days (UK Government, 2000). Information requested can be qualitative and/or quantitative. This research chose to use FOIRs in three ways. First (FOIRs1 and 2), as a much faster, less time consuming and more productive way of conducting what amounted to a census survey of the whole population (Bryman, 2012, p. 709) of all 133 English HEPs than the traditional way of inviting participation. Indeed, it was felt highly unlikely that any HEP would voluntarily divulge the way it used HEFCE monies (FOIR1), their institutional definition of and details of training in ITL or their course validation processes relating to ITL (FOIR2). Second (FOIRs3 and 4), although HEFCE and OFFA required HEPs to submit returns regarding the way they used HEFCE funding destined to boost disabled students' success, and more generally about disabled students, publication was only made at either sector summary or category summary levels. To be of use to this research, publication was needed by HEP and sub-category, leading to FOIR3 being sent to HEFCE/OFFA and FOIR4 to OfS [HEFCE and OFFA were subsumed into OfS in March 2018].

Lastly, FOIR5 requested information from the Student Loans Company (SLC) for information which it might uniquely hold for the sector regarding the number of DSA awards occurring due to a first diagnosis of an SpLD only after entering HE. This information was sought as it would help assess one of the premises underlying the Modernisation, that increased ITL within HEPs would lead to reduced demand for DSA. As discussed in S.4.4.7.1 and S.6.1.1.8, the sole group for which this assertion might hold good would be those receiving their DSA award for the first time only after commencing HE and experiencing difficulties in their studies, which the presence of ITL might mitigate. Upon receipt of the FOIR, SLC issued a Freedom of Information Act (2000) Section 12 exemption on costs/time grounds (SLC, 2019) confirming that whilst it held the data in over 30,000 individual diagnostic assessment reports annually they were too difficult/costly difficult to extract. This response also implicitly confirmed it had not previously extracted this data, even for ministerial use, as the Act obliges such previously generated data to be identified to later requestors, thereby undermining a premise of the Modernisation, see discussion in S.6.1.1.8. This failure to use existing data further justified the need for this research to illuminate the interaction between the Modernisation and HEPs' ITL initiatives.

The four successful FOIRs generated new information in the public domain, but the data already existed in HEPs', HEFCE/OFFA/OfS's and SLC's systems and therefore they could be considered archival in nature. As discussed below, FOIRs1 and 2 generated both quantitative and qualitative data, FOIRs3 and 4 quantitative alone, see S.5.7.

Further archival research was used to generate quantitative information from HESA statistics relating to numbers and characteristics of students awarded DSAs and staff profiles regarding training in HE. These would be used to triangulate the FOIR-derived data, see S.4.4.7.2

The nature of the information sought in the FOIRs

Qualitative data derived in the six prior Studies in this research seeded the questions used in all the FOIRs.

FOIRs1 and 2 sought qualitative and quantitative data regarding ways in which English HEPs:
1. Spent certain HEFCE grant monies supporting disabled students (FOIR1),
2. Trained staff in inclusive teaching, including numbers so trained (FOIR2),
3. Validated courses against inclusive teaching criteria (FOIR2),
4. Incorporated specific learning objectives in that training to meet the needs of students with SpLDs (FOIR2).

Quantitative data focused on:
1. How English HEPs spent the Disability Premium granted to them by HEFCE in AY2016/17 and AY2017/18, (FOIR1),
2. The monetary amounts English HEPs allocated to support their disabled students to improve the inclusivity of their teaching and learning (FOIRs3 and 4).

4.4.   Studies within this research project

This section reviews each all 10 studies.

4.4.1.   Study 1: Nature of an inclusive learning environment (ILE).

4.4.1.1.   Study rationale

As described in the Introduction, S.2, the DSA Modernisation envisaged the development of ILEs at English HEPs however, its announcement did not define the term. Anecdotally, neither the researcher's formal training in supporting adult dyslexic learners in FE and HE during 2011/13, practise as an NMH support worker nor discussion with support worker colleagues had suggested that there was a widely accepted understanding the term 'ILE' within HEPs. Hence, a primary aim of this initial study was to understand what others believed the term to mean. Additionally, as a Government consultation into the Modernisation had been launched, the output of the study could usefully be submitted (BIS, 2015a). Finally, as the first study in the research, the data gathered, and subsequent analysis would inform further studies. In summary, this study had 3 aims, to:

1. Provide a basic level of understanding regarding what NMH practitioners understood by the term 'inclusive learning environment',
2. Provide content for a submission to a Government consultation regarding,
3. *Serve as a resource for developing further studies in this research.*

4.4.1.2. *Study methodology, design and analysis*

The target population comprised Specialist Study Skills tutors (NMH support workers delivering study skills support to disabled students) and those holding positions of responsibility within HEPs' student wellbeing services. These practitioners were likely to be members of two professional organisations, the Association of Dyslexia Specialists in Higher Education (ADSHE) and the National Association of Disabilities Practitioners (NADP) and were invited in a series of three emails to participate through each association's discussion forum, see S.4.3.2.2 regarding sampling approach.

Once potential respondents had expressed interest by email, the survey questionnaire was sent via email attached file, and returned the same way. The questionnaire was designed for simplicity, comprising four questions which could be answered in a personal capacity or on behalf of an HEP for those in an appropriate management position. Answers, in the form of qualitative narrative were solicited in text form to 'tease out' the fine detail of respondents' 'stories' about ILEs.

A Study Information Sheet (SIS) and consent form accompanied the questionnaire, see S.4.5. As there was no automated software driving this study, agreements to participate, email correspondence and ultimate receipt of the questionnaire were logged to an Excel spreadsheet. Completed questionnaires, returned by email, were analysed thematically, see S.4.3.2.4.

4.4.1.3. *Workshop methodology, design, analysis*

The workshop, entitled "Busting barriers to Inclusive Learning Environments", delivered to 23 self-selected delegates attending NADP's June 2016 conference, opened with a 15-minute presentation of the conclusions of this Study. A 30-minute small-group session followed in which delegates identified one or more projects which they had undertaken at their own HEPs to illustrate how they had addressed the nine categories involved with and the eight barriers to an Inclusive learning Environment (ILE) revealed by the Study, see S.5.1.2.2. Groups documented their output onto wall-mounted flipchart sheets in the final 15-minute plenary session. This output was summarised, expanded with a narrative and subsequently published in summary form (Newman & Conway, 2017a). Delegates were asked for their verbal consent for session recording and flipchart content to be transcribed, anonymised, published in academic journals and used in doctoral studies. All assented. The recording was deleted after transcription.

4.4.2.   Study 2: Establish a baseline of effects of early changes on NMH providers and impact of restrictions on remote working tools (RWT) for NMH support delivery

4.4.2.1.   Study rationale

This study, conducted June-July 2016, had two objectives:

1. Establish a baseline regarding NMH support delivery against which later comparisons could be made,
2. Provide evidence, for a submission to Government, of the effect of a March 2016 rule change regarding NMH support delivery which curtailed the flexibility of NMH support workers to deliver NMH support via Remote Working Tools (RWT), such as Skype, when support tutorials could not take place on campus.

The rule stated that the delivery of remote (ie not physically present) support tutorials using communications tools, such as Skype, was possible only after explicit recommendation by Needs Assessors (DSA-QAG, 2016a, pp. 17, 24)[19]. This new rule restricted an existing practice, appeared to contradict notions of inclusivity, was effective immediately and, once published, was subject to much debate, often passionate, on the various email forums for members of ADSHE & NADP, typically expressed by Specialist Study Skills tutors (ADSHE, 2016b); (NADP, 2016b). To offer a research-based response, a short series of questions relating to the use of such RWTs was appended to the baseline survey.

4.4.2.2.   Study methodology, design and analysis

The target population comprised Specialist Study Skills tutors (NMH support workers) likely to be members of NADP and ADSHE. Respondents were invited to link to the semi-structured online questionnaire via emails posted on the ADSHE and NADP email forums, see S.4.3.2.2. The online questionnaire opened with an SIS, see S4.5, and a question requesting informed consent.

The study comprised an initial demographic section followed by two further parts relating to the two objectives in which closed questions were asked to established basic factual information followed by open questions inviting narrative responses. Completed questionnaires were analysed thematically, see S.4.3.2.4.

Results regarding establishing the baseline are published here for the first time, see S.5.2. A summary submission was made to Government regarding the use of RWTs but within days events overtook the project's timetable. In August 2016, DfE published a clarification, "We recognise that on occasion the student may wish to receive their support remotely, for example if they are on a field trip abroad, or not able to attend the usual place of delivery for a particular session." (DfE, 2016). This position was codified mid-2017, such that a

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[19] "Remote NMH support (for example over Skype) should only be provided where specifically recommended (including as an alternative) in the Needs Assessment Report."

documented student request could initiate such remote delivery (DSA-QAG, 2017b, pp. 24, S2.4), the requirement for a Needs Assessor's explicit recommendation had been abandoned. Nevertheless, the findings were thought useful for the sector and subsequently published (Newman & Conway, 2017b). A summary of the findings together with a newly developed discussion are included in this research, see S.5.2.1.5 and 5.2.1.6.

4.4.3.   Study 3: Inclusivity Officers: Implementing ILEs

4.4.3.1.   *Study rationale, methodology, design and analysis*

Study 1, above, identified the components of ILEs and the analysis indicated that HEPs were progressing at different speeds in their implementations, subject to differing constraints and had achieved a range of outcomes. This study, therefore, explored more deeply the environments in which ILEs were implemented to better understand the projects' dynamics.

Eight respondents were snowball sampled[20] via a professional colleague in the role of Inclusivity Officer who made email contact with a small number of potential respondents asking permission for the researcher to make contact; the process was iterated with each new respondent (Bryman, 2012, pp. 202-203, 716); (Cohen, et al., 2011, pp. 158-160). Snowball sampling appeared appropriate as it allowed access to a group which was not easy to access but the method's limitations of yielding a group with unknown levels of bias was acknowledged. However, given this small Study's size and its purpose, to provide a background regarding the dynamics of inclusivity projects, it did not aspire to be representative of the sector as a whole (Heckathorn, 2011). However, respondents' roles were known by different names and were not necessarily easily identifiable within HEPs' hierarchies, hence they could be regarding as a hard to reach population. As mentioned, this method of sampling has the drawback of bias, individuals knew each other and therefore potentially shared similar views. However, potential personal bias was offset by the questions being focussed on respondents' jobs and their functional experiences therein, which would likely differ by HEP and individual. The recruitment criterion was that respondents had significant responsibility for operationally driving forward their HEP's inclusivity agenda. Each agreed to be telephone interviewed using a pre-notified set of 20 semi-structured questions which included an SIS, as discussed in S.4.5.

Initial interviews, December 2016-February 2017, investigated the nature and presence of institution-wide support, effective and ineffective strategies and respondents 'wish list' for their job. Follow-up interviews, June 2017-August 2017, captured longitudinal outcomes against the open question, "What has happened since the previous interview?"

The survey was semi-structured, specific questions were posed; respondents allowed time to answer the specific question and to develop their answers further. Interviews were

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[20] Snowball sample – "a non-probability sample in which the researcher makes initial contact with a small group of people who are relevant to the research topic and then uses these to establish contact with others" (Bryman, 2012, p. 716).

recorded using Sonocent Audio Notetaker. MP3 format audio files were extracted to allow 'manual' transcription by the researcher. Transcripts were compared to the original audio and corrected as required to ensure veracity then thematically analysed, see S.4.3.2.4.

4.4.4. Study 4: One year in – effects of changes on NMH providers

4.4.4.1. Study rationale

The Modernisation's changes regarding delivery of NMH support, announced in April 2014, took effect from the start of AY2016/17, one such being the appointment by the DfE of the Disabled Students' Allowances Quality Assurance Group (DSA-QAG) to regulate NMH support delivery in England using a quality control (QC) approach (DSA-QAG, 2018b)[21]. QC was effected through the issue, audit and enforcement of the Non-Medical Help Quality Assurance Framework (NMH QAF), Version 1 published in March 2016 (DSA-QAG, 2017a).

As the changes came into force, their effects were discussed by NMH practitioners on some of their professional associations' Jiscmail members' forums, for example the Association of Dyslexia Specialists in Higher Education (ADSHE, 2016a), the National Association of Disability Practitioners (NADP, 2016a), the Association of NMH Providers (forum not archived). As part of these interchanges, the professional organisations requested that members provided them with evidence of the changes' effects so that they could be discussed with DfE and DSA-QAG. Hence, the rationale for this study became, in part, to help provide that evidence. The professional associations were asked to review the survey questionnaire to ensure its appropriateness prior to finalisation. Editorial control remained with the researcher. Once reviewed, the invitation to participate was posted on the respective Jiscmail forums by the researcher, who had access by virtue of his own membership, see 4.3.2.2. The resultant report was provided in confidence to the associations' boards, as well as one other active in the sector, the Professional Association of Teachers of Students with Specific Learning Difficulties (PATOSS) for them to use however they saw fit in discussions with DfE and DSA-QAG. The narrative presented in this research, see S.5.4, represents a summarised version of that report, identifying the key issues.

4.4.4.2. Study methodology, design and analysis

Invitations included a statement of aims for the study and an SIS, see S.4.5 plus a hyperlink to a mixed method questionnaire. Quantitative data was gathered via Likert scale questions and qualitative data via open questions and narrative answers. Typically, open questions were placed after one or more Likert-scale questions to allow respondents to provide context and further explanation of their Likert scale answers (Bryman, 2012, pp. 246, 248-252). Narrative answers were thematically analysed, see S.4.3.2.4.

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[21] DSA-QAG ceased operations at end 2019. Its documents were not preserved either by a successor organisation (of which none) or DfE. In this bibliography all DSA-QAG documents are referenced by their original URLs as a matter of academic integrity although these links, if clicked will result in a *Page Not Found* error message. This note also appear at the head of the Bibliography.

4.4.5.   Study 5: One year in - effects of changes on HEPs' disabilities services functions

4.4.5.1.   Study rationale

HEPs' student/disability support units were subject to the Modernisations' changes. As described in Appendix 4, S.10, HEPs role in delivering NMH support changed, particularly regarding the breaking of the link between the HEP and its historical position as the provider of both higher education and generally of additional, DSA-funded, NMH support for its disabled students. This new approach to NMH provision was implemented by Disabled Students' Allowances Quality Assurance Group (DSA-QAG) (DSA-QAG, 2018b) through its NMH QAF (DSA-QAG, 2017a).

From AY 2016/17, the NMH support was delivered through registered NMH providers, in which status an HEP could, but was not compelled to, register. NMH providers, identified through a newly established centrally held database of registrants, were nominated by Needs Assessors in their Needs Assessment Reports, and subsequently selected by Student Finance England to supply the support based on cost. Hence, for any one student's NMH support, the recommended NMH provider might be their HEP, if it had registered as an NMH provider, been nominated by the Needs Assessor as a potential supplier and selected by SFE, or a 3rd party NMH provider with no particular link to the HEP, see Appendix 4, S.10.

As the changes took effect, HEPs experienced significant impact on their Disabilities Support functions, some Heads of which discussed their concerns within the NADP which maintained a closed email forum for Heads of Disabilities Services (Conway, 2020). Additionally, issues HEPs faced were discussed more widely in other NADP forums, eg the open, members only general NADP email forum and in person at academic events. The researcher, as an NADP member knew of these concerns and approached the then Chair of NADP with a view to conducting a survey amongst the closed Heads of Services email group to provide a confidential report on their responses to the changes which NADP could then, if it so chose, use in discussions with the DfE and/or DSA-QAG. This *quid pro quo* of provision of report for NADP requesting participation in the survey was agreed by the then Chair of NADP (Turner, 2017).

4.4.5.2.   Study methodology, design and analysis

HEPs' Heads of Disabilities Services, members of NADP, were surveyed in June-July 2017 regarding their views on how the Modernisation had affected their HEPs in the first year of full implementation. The study questions were drafted then circulated them to the then Chair of NADP and one other board member for critique and advice. Invitations to participate via an online questionnaire were subsequently sent via NADP's closed Heads of Service Jiscmail email list. Invitations comprised a supportive letter from the Chair of NADP, and an SIS, see 4.5.

The mixed methods questions gathered quantitative data via Likert scale questions and qualitative data via open, free-text questions. Typically, open questions were placed after one or more Likert-scale questions to allow respondents to provide context and further explanation of their Likert scale answers (Bryman, 2012, pp. 246, 248-252). Narrative answers were thematically analysed, see S.4.3.2.4.

4.4.6. Study 6: NMH providers' response to DSA-QAG NMH Audit Roadshow

4.4.6.1. Study rationale

In October 2017 DSA-QAG held NMH provider "roadshows" in both London (morning & afternoon) and Birmingham (morning only) to offer feedback on the first year of operation of the DSA-QAG NMH provider audit process, this latter mandated by the NMH QAF. Attendance was limited to 50 at each session. The invitation read:

> "As the Non-medical Help (NMH) audit process is a new process for NMH providers, DSA-QAG are hosting NMH Roadshows. The purpose of the roadshows are [sic] to provide NMH providers with information on the audit process, to share areas of best practice identified during the audit process and general feedback from NMH providers. The roadshows will also be attended by colleagues from the Department for Education and Student Finance England" (DSA-QAG, 2017e).

As an NMH provider, the researcher was invited to and attended a London session where he observed somewhat angry and frustrated attendees. This reaction was such that the researcher wanted to discover if that response had been the same at the other sessions. In addition, during the session attended by the researcher DSA-QAG had suggested that if attendees wanted to bring matters to the attention of DSA-QAG then they could do so via their professional associations. As the researcher had already conducted research with the support of these professional associations, S5.4 and S.5.5 a further aim of this survey would be to provide feedback for these associations to discuss with DSA-QAG. Additionally, a further professional association, PATOSS, was contacted with a view to its members' participation.

After the survey was launched the researcher was contacted by DSA-QAG's Chief Executive who objected to the survey being run without DSA-QAG's approval. After a short exchange of emails and a telephone call in which matters were aired, and the public domain nature of the events discussed, it was agreed that a copy of the report which was sent to the professional associations would also be sent to DSA-QAG; this action was possible under the terms of the informed consent, as discussed in 4.5, particularly as all respondents' input would be anonymised.

4.4.6.2. Survey methodology, design and analysis

NMH providers were invited to participate via emails posted on the ADSHE and NADP JiscMail forums and via an email from the Chairperson of PATOSS to its members

(Greenwold, 2017); the email text was repeated as the first page of the online questionnaire, Appendix 8, S.14. The invitation to participate identified that the survey sought feedback on the DSA-QAG roadshows, was part of doctoral studies and independent of DSA-QAG, Student Finance England (SFE), SLC and DfE. The email contained the SIS within it, see S4.5. The invitation contained links to the slides DSA-QAG had circulated and the feedback which it had provided on the questions raised at the roadshows; both documents had been publicly circulated by DSA-QAG with no restriction on usage (DSA-QAG, 2017i).

The study questions were mixed method and carefully constructed to elicit observations about the events' organisation and presentations' content rather than offering an opportunity to level personal criticism at the presenters, given the anger and frustration the researcher had observed.

Quantitative data was gathered via Likert scale questions and qualitative data via open questions. Typically, open questions were placed after one or more Likert-scale questions to allow respondents to provide context and further explanation of their Likert scale answers (Bryman, 2012, pp. 246, 248-252). Narrative answers were thematically analysed, see 4.3.2.4.

4.4.7. Studies 7, 8, 9 and 10: Assessing the extent of inclusive teaching in English HEPs using Freedom of Information Requests (FOIRs1-4)

4.4.7.1. *Studies' rationale*

Rationale for FOIRs1 and 2

As briefly mentioned, see Ss.3.2.4 and 3.2.4.1, some of the findings of HEFCE's *Models of Support for Students with Disabilities* (Williams, et al., 2017), , were previewed, five months prior to publication, at the NADPs annual conference, which the researcher attended. HEFCE's Programme Manager for the National Collaborative Outreach Programme commended the £20m increase to £40m pa in HEFCE's Disability Premium to help HEPs move towards inclusive models of support and to support increasing numbers of disabled students and those with mental health difficulties. However, several delegates apparently unaware that a Disability Premium had been granted to their HEPs questioned between themselves and to the researcher how it might have been used. The report when eventually published did not answer that question. This absence became the rationale for this research's FOIR 1 enquiring how each of the 133 English HEPs had spent their Disability Premium in AY2016/17 and AY2017/18.

HEFCE's speaker also enthusiastically reported a finding regarding HEPs' progress towards an 'inclusive social model of support', see S.3.1 regarding the social model of disability. Numerous delegates expressed surprise to the researcher that over 50% of HEFCE's respondent HEPs, often delegates' own employers, believed they were over halfway to delivering that model, Figure 18. Some delegates were also worried that the speaker did

not mention the criteria against which respondents adjudged their progress, leaving the assessment entirely subjective. The report, when published, confirmed the lack of criteria and any common definition of inclusive teaching and learning.

The disquiet of delegates at that preview and the absences in the report became elements in the rationale for FOIR 2 which asked how HEPs defined inclusive teaching, trained their academics in it and validated courses for its presence.

Figure 18: Report: *Models of Support for Students with Disabilities*.
Responses to question "On a scale of 1-10 where 1 is not inclusive and 10 is fully inclusive, how far along do you feel you are in providing an inclusive model of support?" (Williams, et al., 2017, p. 96)
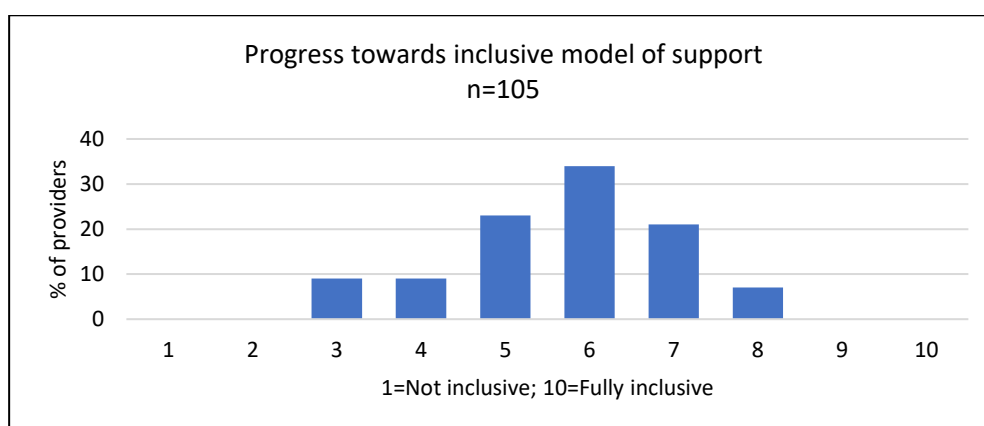
Note that in follow-on research commissioned by OfS, respondents were again asked to self-rate, similarly with neither objective nor stated criteria, showing a movement of the mean from 5.67 to 6.16 on a smaller sample (61 *vs 105)* (Williams, et al., 2019), see S.3.2.5.

Additional Rationale for FOIR2

FOIR2's focus on inclusive teaching was also framed around the then recent legislative changes in the HE sector. The Higher Education and Research Act, HERA (2017a) created The Office for Students (OfS) and UK Research and Innovation (UKRI) to focus on teaching and research, respectively (Pennington Manches, 2018). HERA made "provision for a quality rating scheme…delivered through the Teaching Excellence Framework (TEF)" (UK Government, 2017b). Following HERA's lead regarding the importance of teaching, FOIR2 asked HEPs explicitly about their definition of inclusive teaching, the extent and content of academics' training in inclusive teaching and the incorporation of inclusive teaching criteria in course/programme validations with a view to gaining insight as to how these elements might be incorporated in some future rating system.

A further rationale for this study was based on May & Bridger's (2010) statement that in order to achieve an "embedding of equity considerations [in HEPs]", which for this research equates to the embedding of inclusive practices, a "systemic change…[at the] practice level"

is required. Given that one of the primary functions of an HEP is to impart knowledge, that is to teach, this study focussed on gaining clarity on HEPs' inclusive teaching.

Rationale for FOIRs3 and 4

Responses to FOIR1 identified that OFFA and HEFCE gathered monitoring data from HEPs regarding *Widening Access, Improving Retention and Improving Provision for Disabled Students* and that the exercise of 2016/17 had recently closed (January 2018). This data included a new element in Table 3b, namely "*Improvement of inclusivity of teaching and learning"* (HEFCE, 2017b)*.* This data, if it were available at an institutional level would provide a valuable source against which to triangulate responses to FOIR1 and to assess the extent to which HEPs might be addressing the development of an inclusive curriculum. The data would also serve to triangulate the HEFCE report which had been presented at the NADP's 2017 conference (Williams, et al., 2017), see S.3.2.4.

To obtain this data FOIR3 was jointly addressed to OFFA/HEFCE, ultimately answered by OfS, resulting in a unique dataset showing each HEP's five categories of expenditure relating to disabled students. Public domain data had only been previously published at summary, sector-level (OfS, 2018c)*.* OfS was further approached in March 2019 to provide the corresponding 2017/18 dataset. The request was initially refused on the grounds that the summary level publication had not yet occurred, but following that data's publication in December 2019, FOIR4 was resubmitted and supplied in February 2020 again being unique (OfS, 2019c).

Rationale for FOIR5

A contention contained in the initial Modernisation announcement, see Appendix 1, S.7, was that ITL would reduce the numbers of DSA awarded. To test this contention, data was required on the ratio of students entering HE with a pre-existing diagnosis of disability and DSA already awarded *vs* those diagnosed only after entering HE. This latter group being the only one for which ITL might have reduced their need to apply for DSA, see also S.4.3.2.5 and S.6.1.1.8.

4.4.7.2.   Studies' methodology and design and analysis

The five FOIRs are summarised in Table 11.

Table 11: Summary of FOIRs' Question Area		
FOIR Number and date	**Question Area**	**Sent to**
FOIR1, January 2018	Use of AY2016/17 & AY 2017/18 Disability Premium	All 133 English HEPs
FOIR2, June 2018	Inclusive teaching – definition, training, validation of courses	All 133 English HEPs
FOIR3, March 2018	HEPs' expenditure on improvement of inclusivity in teaching and learning AY2016/17	HEFCE (but answered by OfS into which it had been subsumed in March 2018)
FOIR4, March 2019, February 2020	HEPs' expenditure on improvement of inclusivity in teaching and learning AY2017/18	OfS
FOIR5, April 2019	Number of DSA awards where initial diagnosis occurred after entry into HE	SLC

As mentioned in S.4.3.2.5, The Freedom of Information Act (2000) allows public bodies, such as HEPs, to be questioned about their activities, requiring a response, subject to defined exemptions, within 20 working days (Information Commissioner's Office, n.d.), see S.4.3.2.5. Whilst not all responses were received promptly, after email follow-up, FOIRs1 and 2 received 131 (98.5%) and 132 (99.3%) replies, respectively. As these FOIRs represented HEPs' interpretation of and views about the questions posed they required triangulation against "quantitative unobtrusive data" (Bryman, 2012, p. 325), sourced independently of this research, to provide a cross-check ideally yielding greater reliability (Atkinson & Coffey, 2011) in (Bryman, 2012, pp. 392, 555, 633-636, 717).

4.4.7.3. Constructing Freedom of Information Requests

The UK Information Commissioner (ICO) is responsible for the operation of the Freedom of Information Act (2000) and offers advice about wording FOIRs (Information Commissioner's Office, n.d.). Besides 'obvious' functional guidance relating to checking if the information requested already exists in the public domain, providing requestor details, stating preferred response format, avoiding offensive language and levelling accusations ('vexatious' requests), the ICO website suggests FOIRs have a high degree of specificity and that requestors should be flexible regarding the receiving authority's responses.

Hence, FOIRs1 to 5 identified precisely which information was required, and supplied the provenance of that information, ie HEPs submitted returns. For FOIRs1 and 2 correspondence was required with a number of HEPs regarding either requests for clarification, the need to turn a refusal to supply data into an agreement to supply data, eg because of a misunderstanding of the request, or merely reminders that they were overdue in the mandated 20 working day response. For FOIRs3 and 4, patience over several months in addition to flexibility were required to turn refusals (claims of exemption) to supply data into provision, see S.4.4.7.5.

4.4.7.4. FOIRs1 and 2

FOIRs1 and 2 were sent to all 133 English HEPs but not FECs using OFFA's, then OfS's register (OfS, 2018a). FOIR1 investigated ways in which HEPs spent their HEFCE 2016/17 and 2017/18 £40m pa 'disability premium' allocated for the purpose of "…supporting HE providers to move towards inclusive models of support and to meet the rapid rise in students reporting disabilities, particularly mental health issues" (HEFCE, 2016a). The second investigated how HEPs defined inclusive teaching, trained their academics in it and validated courses regarding its incorporation. FOIR2 specifically focused on inclusive teaching regarding students with SpLDs, who, according to HESA 2015/16 data were the largest group in receipt of DSAs, 50.2% of 178,920 receiving them (Williams, et al., 2017, p. 20). Additionally, students with SpLDs were reported as comprising 44.6%, 42.0% and

36.5% of all UK domiciled disabled student enrolments in AYs2015/16, 2016/17 and 2017/18 (HESA, 2019b)[22].

FOIR1's responses, regarding HEPs' use of their Disability Premium, were triangulated against FOIR3 and 4's datasets based on the abovementioned HEFCE/OFFA monitoring exercise, ultimately provided by the Office for Students (OfS) after both organisations became part of OfS in early 2018.

FOIR2's responses regarding the extent to which academic staff received training in inclusive teaching were triangulated against HESA's *Number of Teaching Staff* (HESA, 2019a), which showed for AY2014/15-2017/18 the numbers of academic staff who held or did not hold a HE teaching qualification and the numbers whose HE teaching qualification was unknown. FOIR2's responses were further triangulated against materials describing HEA's Fellowship Scheme (HEA/Advance HE, n.d.), that Scheme's underlying UK Professional Services Framework (UKPSF) (HEA/Advance HE, 2011) and the UK Quality Assurance Agency's Quality Code (QAAQC) (QAA, 2012); (QAA, 2013).

Excel spreadsheets were used extensively to store the responses, being held behind passworded security in accordance with GDPR regulations, see also S.4.5, narrative responses were thematically analysed, see S.4.3.2.4.

4.4.7.5. *The route to obtaining information under FOIRs3 and 4*

The route to obtaining the information requested in FOIRs3 and 4 required patience.

Information request FOIR3 and 4

a. Initial request to OFFA requesting information submitted as part of the HEFCE/OFFA monitoring exercise

The initial request was made to OFFA, 27/2/18, and stated:
> "In my research some HEPs have identified that they send OFFA an annual return in which there is data entitled "Student success expenditure for support for disabled students". Within that category, they report:
> 1. Expansion of disability services (additional staff, training and resources)
> 2. Expansion of assistive technologies
> 3. Improvement of inclusivity of teaching and learning
> 4. Creation or extension of learning support posts
> 5. Other
>
> My query is to ask if this information is reported anywhere on the OFFA website, and if so, where, as I would very much like to access and analyse it.
>
> If the information is not currently available, please would you advise whether it would be available via an FOI request, which I would be happy to submit."

---

[22] Not all students who HEPs report as declaring themselves disabled are in receipt of DSA, hence the discrepancy between the two-quoted figures for 2015/16.

OFFA's initial response was a "S17 refusal to supply" on the grounds that the information was already in the public domain.

b. Clarification process

An email correspondence ensued which clarified that the information requested was as at provider level, not the summary data previously published. The correspondence precisely identified the nature of the data being requested:

> "HEPs were required in January this year (17/1/18) to submit information entitled Access Agreement Monitoring. Here is the link to the relevant table templates: http://www.hefce.ac.uk/media/HEFCE,2014/Content/Pubs/2017/201730/HEFCE2017_30a.pdf and here is the HEFCE landing page relating to the required submission: http://www.hefce.ac.uk/pubs/Year/2017/201730/ "

c. Closure of HEFCE and OFFA

The correspondence continued. There was some confusion at OFFA as to the details of the request which was finally resolved on 22/3/18 when OFFA indicated that it only held the data for total student success expenditure for support for disabled students for each HEP whereas the breakdown of that figure into its constituent categories, particularly "improvement of inclusivity of teaching and learning" was held by HEFCE. OFFA supplied the total by HEP for AY2014/15 and AY2015/16.

OFFA had taken the initiative by asking HEFCE to supply the requested data and indicated that HEFCE AY2016/17 would be replying in due course but that the formation of OfS from 1/4/18 might delay receipt beyond that date, in which case it would be supplied by OfS. OFFA further suggested that AY2017/18 data might be available in May 2018 after the publication of that year's summary data.

d. Provision of AY2016/17 data and delay in AY2017/18

OfS provided the AY2016/17 data on 13/4/18. However, it did not achieve the May 2018 publication for AY2017/18 summary data. Correspondence continued sporadically during 2018 until it was suggested in early 2019 that an FOIR should be submitted to determine the formal position. This suggested resulted in FOIR4 on 13/3/19 with reference made to the prior year's request:

> **"Freedom of Information Request to the Office for Students, March 13th 2019 HEP's Expenditure on Disabled Students**
>
> > This is a Freedom of Information Request, under the Freedom of Information Act (2000) relating to HEPs' expenditure on disabled students 2017/18, for academic purposes.

I note that you kindly sent me the equivalent information for 2016/17 in response to my FOIR dated 13/3/18 in the following format. A similar columnar format is requested, duly modified for the 2017/18 categories:

UKPRN	Institution	Expansion of disability services	Expansion of assistive technologies	Improvement of inclusivity of teaching and learning	Creation of extension of learning support posts	Other

The requirement to provide the underlying information was notified to HEPs in OfS document 2017-18 Access Agreements and Student Premium Funding Guidance on How to Complete your Monitoring Return, reference OfS 2018.49, 13/11/18, submission deadline 23/1/19. It is described in paragraph 51, p.10 of that document:

"In Table 3b, provide the expenditure that has occurred to support disabled students against the expenditure categories provided. This table will enable the OfS to understand providers' expenditure on core, ongoing work to support disabled students and on work to expand and improve their provision towards an inclusive model of support for disabled students. Please also indicate how much of your support for disabled students was funded from your disabled students' premium in 2017-18."

Table 3b is also shown in the OfS document Student Premium Monitoring Return https://www.officeforstudents.org.uk/media/b2f170fa-8746-4a23-8322-ca66da88d943/student_premium_2017-18_monitoring_return.pdf

I look forward to your acknowledgement of receipt of this request and of the data."

e. FOIR4 initial response

OfS's initial and formal response, 10/4/19, was to issue a S36 refusal to supply on the grounds of "prejudice to the effective conduct of public affairs". That refusal included reference to the need not to favour any party by the early release of statistical information prior to published release date except to those engaged in the production of the data. Additionally, there was a judgement that the data by provider would not in any case be insightful, that sector summary level would be sufficient. An email correspondence ensued which suggested that once the summary level data were published, the FOIR could be resubmitted for consideration as any release at that time would not constitute early availability, email dated 16/4/19. However, OfS retained its freedom of action, "We would need to reassess whether we could release the provider level information to you once the data has been processed and the sector level information has been released in May/June".

f. Further correspondence regarding FOIR4

An email exchange dated 28/8/19, stated that:

> "The relevant staff have advised that the current plan is for us to publish some summary data related to the monitoring of 2017-18 access agreements alongside the summary of outcomes of the 2020-21 Access and Participation Plans process. Timetable for the latter is not completely fixed (assessments are still underway), but we're currently expecting to publish in October [2019]."

g. Successful receipt of FOIR4's requested data

Summary data publication ultimately occurred in December 2019, FOIR4 was resubmitted and data received in February 2020. The data was accompanied by advisory notes, discussed in S.5.7.5.3.

4.5.   Ethical considerations

The research was conducted under the British Education Research Association's Ethical Guidelines (BERA, 2011) and respected the provisions of the Data Protection Act (1998). Qualitative data gathered through interview and online questionnaire were subject to the provision of an SIS, see Appendix 9, S.15. Respondents were asked for their explicit informed consent as the first question in all circumstances, verbal in telephone interviews and as the 'gatekeeper question'[23] in online questionnaires. Respondents were informed by the SIS of their right to withdraw at any time, without prejudice, that their input could be used in academic publications, submitted to Government or industry bodies as well as in doctoral research but that in all cases it would be anonymised.

Although the research pre-dated the General Data Processing Regulation(GDPR) (GDPR, 2016/679), when the GDPR came into effect in 2018, content was deleted from disk storage which could identify participants, email addresses if respondents had supplied these and telephone interview MP3 audio recording files (Study 3). Data collection, storage and usage complied with the Data Protection Acts (1998) and (2018) as guided by the ICO, (Information Commissioner's Office, n.d.). Specifically all data was stored behind passwords, data was encrypted on local disk, communication with "cloud storage" (Dropbox and Microsoft One Drive) used Hypertext Transfer Protocol Secure (HTTPS), respondents' names, where these were given were anonymised.

Ethical approval for the research was sought and granted by the Royal Agricultural University under approval no. 2020.0007.

Quantitative data provided by public bodies was used in accordance with the UK Open Government Licence (UK Government, 2017c).

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[23] Gate keeper question: The first question in online questionnaires which depending on the answer either allows or blocks access to the substantive part of the questionnaire.

The Joint Information Services Committee's academic mailing list system, Jiscmail, was used to contact potential survey participants (JISC, n.d.), see S.4.3.2.2. Jiscmail allowed invitations to be posted inviting participation in studies in this research, whilst preserving the anonymity of recipients registered on its databases. Jiscmail was compliant with current UK Data Protection Legislation, including the Data Protection Act (1998) and the GDPR (GDPR, 2016/679); (JISC, 2018b).

5. Results and discussion

This section presents and discusses results from 11 studies. Table 12 shows Study date, objective, method, respondents and number of responses, see S.4.3.2 for the full table, Table 10. Figure 19 shows the studies' timeline, see S.2.3 for other timeline diagrams. See Appendix 8, S.14 for Studies' 1-6 questions and Appendix 12, S.18 for the five FOIRs' content. The researcher's academic papers published and conference papers/workshops given during, and based on, this research are shown in Appendix 15, S.21.

No.	Date	Objective	Method & time horizon	Respondents	n
		Table 12: Studies comprising this research			
1	Sep 2015	Understand the nature of an inclusive learning environment.	Semi-structured emailed questionnaire. Cross-sectional.	Specialist study skills tutors, managers in HEP's student wellbeing services.	64
2	Jul-Aug 2016	1. Establish baseline of effects of early changes on NMH providers. 2. Investigate use of Remote Working Tools for NMH support delivery.	Semi-structured online questionnaire. Longitudinal with Study 4.	Independent NMH providers, Corporate (agency) NMH providers (not HEPs), HEPs.	73
3	Sep 2016-Jun 2017	Identify HEPs' challenges implementing inclusive learning environments.	Two-stage semi-structured telephone interview. Longitudinal.	Individuals with role of "inclusivity officer".	8
4	Apr-Jun 2017	Understand effect of changes on NMH providers after 1 year.	Semi-structured online questionnaire. Longitudinal with Study 2.	Members of professional associations ADSHE, NADP, PATOSS, ANMHP.	262
5	Jun 2017	Understand effect of changes on HEP's disability support functions after 1 year.	Semi-structured online questionnaire. Cross-sectional.	Heads of HEPs disability support services who were members of the NADP.	21
6	Oct 2017	Understand practitioners' response to DSA-QAG audit roadshows.	Semi-structured online questionnaire. Cross-sectional.	Attendees at DSA-QAG audit roadshow events (members of professional associations ADSHE, PATOSS, NADP, ANMHP).	20
7	Feb 2018	Understand how HEPs used HEFCE Disability Premium funding aimed at supporting HEPs' progress towards the social model of disability.	FOIR1 ** Cross-sectional. HEFCE statistics. Longitudinal.	All English HEPs.	131
8	Jun 2018	Understand HEPs definition of, training in and validation of courses against criteria including inclusive teaching.	FOIR2 ** Cross-sectional. HESA statistics. Longitudinal.	All English HEPs.	132
9	Mar 2018	HEPs' actions to improve inclusivity of teaching and learning (AY2016/17).	FOIR3 ** Cross-sectional.	OFFA/HEFCE (later OfS) data returns.	133
10	Mar 2019	HEPs' actions to improve inclusivity of teaching and learning (AY2017/18).	FOIR4 ** Cross-sectional.	OfS data returns.	133
11	Mar 2019	Number of SpLD first diagnoses after entering HE	FOIR5. Cross sectional.	Student Loans Company (SLC)	Refused see S4.3.2.5

**Note: Studies 1-6 are each reported separately. Studies 7-10 are combined in a single section entitled *Assessing the extent of inclusive teaching in English HEPs*, see S.5.7.

Figure 19: Timeline of this research's sub-studies 2015-2020

Timeline of this research's Studies 1-11, 2015-2020

	H1 2014	H2 2014	H1 2015	H2 2015	H1 2016	H2 2016	H1 2017	H2 2017	H1 2018	H2 2018	H1 2019	H2 2019	H1 2020	H2 2020
Sub-studies	DSAs' Modernisat-ion programme announced, effective AY2015/16 (Willetts: 4/2014)			Study 1: Understand the nature of an inclusive learning environment		Study 2: Establish baseline of effects of early changes on NMH providers, and Investigate use of Remote Working Tools Study 3: Identify HEPs' challenges implement-ing ILEs	Study 4: Understand effect of changes on NMH providers after 1 year Study 5: Understand effect of changes on HEPs' disability support functions after 1 year	Study6: Understand practitioner response to DSA-QAG roadshows	Study 7: Understand how HEPs used HEFCE funding aimed at supporting HEPs' progress towards social model of disability (FOIR1) Study 8: Understand HEPs' definition of, training in and validation of courses against criteria including inclusive teaching (FOIR2) Study 9: Analysis of HEPs' actions to improve inclusivity of teaching and learning (AY2016/17) (FOIR3)		Study 10: Analysis of HEPs' actions to improve inclusivity of teaching and learning (AY2017/18) (FOIR3) [request ref Study 10 resubmitted: Analysis of HEPs' actions to improve inclusivity of teaching and learning (AY2017/18) (FOIR3) [Second, successful, request]] used] Study 11: Number of SpLD first diagnoses after entering HE (request refused)			

5.1. Study 1: Nature of an Inclusive Learning Environment (ILE)

The output from this study was used selectively in a submission to a Government consultation and a workshop at the National Association of Disability Practitioners (NADP) 2016 Conference.

5.1.1. Study Summary

This study had three purposes:

1. Identify what Higher Education (HE) disability practitioners (Non-Medical Help (NMH) providers and support workers, Heads of Disability Services) understood by the term 'inclusive learning environment' (ILE),
2. Provide this information as input to a 3-month UK Government Equality Impact consultation (BIS, 2015a) regarding the Disabled Students' Allowances (DSA) Modernisation (BIS, 2014c),
3. Identify topics and questions to inform later studies within this research.

The term ILE was not defined in either the Modernisation proposals, or the Equality Analysis. This Study's primary purpose was to consult practitioners who supported students with Specific learning Difficulties (SpLDs) regarding:

1. Their understanding of the term,
2. Barriers faced when implementing ILEs,
3. Those aspects of SpLDs which ILEs might not address.

Building on this study, a workshop at the NADP's 2016 annual conference allowed a 'snapshot' of successes in and challenges to creating ILEs experienced by self-selecting workshop delegates - practitioners who supported SpLD students.

Additionally, the Department for Business Innovation and Skills (BIS) sought sector input on the DSA Modernisation Programme's impact on disabled students, seeking to understand what might be considered costs additionally incurred by virtue of disability once HEPs had made necessary anticipatory reasonable adjustments and moved towards providing ILEs. However, it conceded that whilst ILEs and anticipatory reasonable adjustments would remove the reliance on DSAs for some SpLDs, they would not for all (BIS, 2015a, p. 67).

5.1.2. Study Results

5.1.2.1. Response

Sixty-four responses were received to this qualitative questionnaire survey. Respondents' SpLD learners studied at 54 Higher Education providers (HEPs), 49 English, 4 Welsh and 1 Scottish; 2 did not specify any HEPs representing a wide cross-section of roles, a number held multiple roles, Table 13 and Figure 20 present the demographics in both tabular and chart format, respectively.

Table 13: Number by Respondents' Role	
Respondent Role	**Number of Roles Responding**
Head of, or manager within, a Disability Service	17
Specialist Study Skills Tutor	41
Specialist SpLD Diagnostic Assessor	13
Lecturer	2
Learning Developer	2
Assistive Technology (AT) Trainer	1
Specialist Mentor	1
Disability Advisor	3
Head of, or manager within an Assessment Centre	1

Figure 20: Number by Respondents' Role
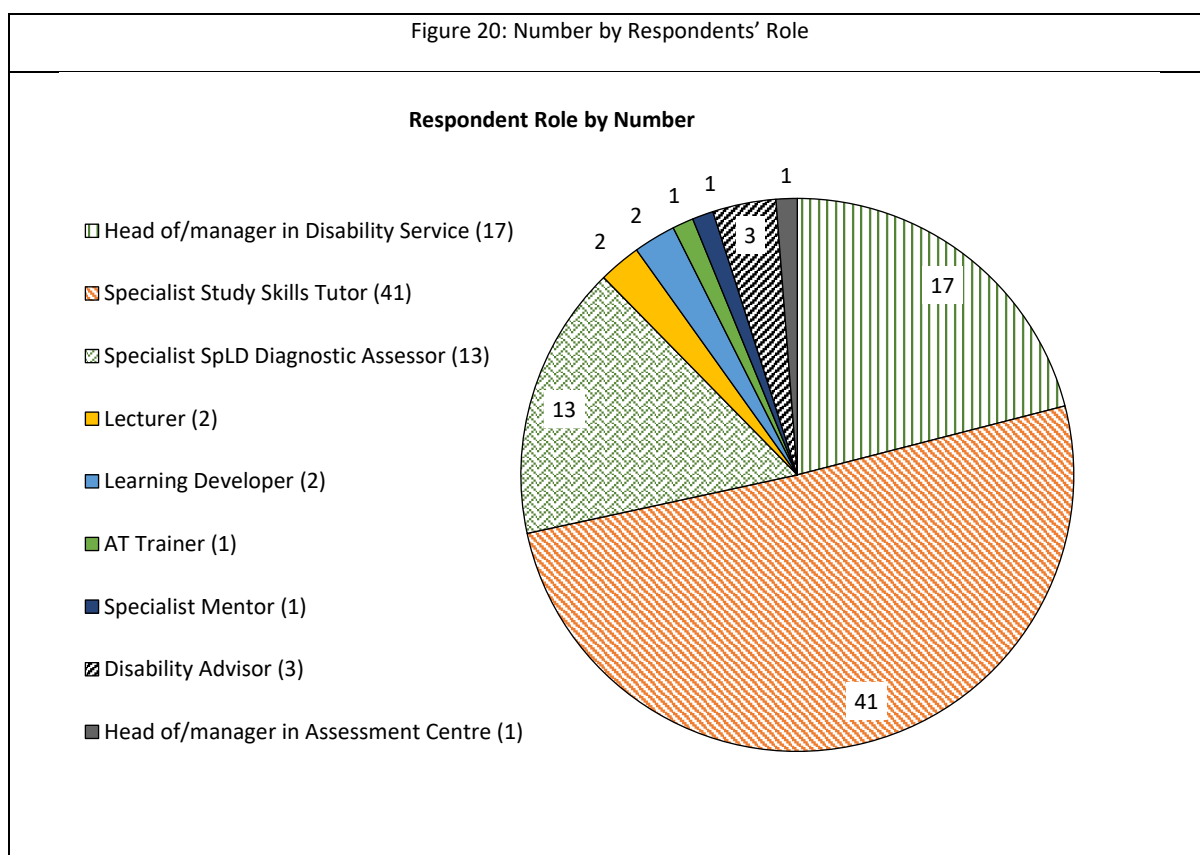
5.1.2.2.   The nature of an ILE

Nine themes emerged regarding ILE's nature:

1. Philosophy or mission,
2. Management,
3. Technology,
4. Assessment design,
5. Design of course specific materials,

6. Design of non-course specific services,
7. Academic staff awareness, training and attitude,
8. Wellbeing support environment,
9. The built environment.

1. Philosophy or mission

Respondents showed considerable commonality in describing the 'philosophy' or 'mission' of an ILE. Illustrative comments, by number of mentions, were:

1. Anticipates needs,
2. Whatever their academic needs, all students can access all aspects of their course,
3. For each course, an HEP should provide a clear understanding of the tasks a student must perform to achieve learning,
4. Allows achievement of all individuals' learning potential,
5. Where all involved in teaching and/or leading learning have genuine interest in and commitment to creating diverse learning opportunities,
6. Teaching is supportive and non-judgemental. Learners feel safe in the learning environment,
7. Recognises, responds to, celebrates different learning styles,
8. Delivers course materials in formats in which all can participate. Delivers assessments in formats which are accessible to all and judge learners' strengths not weaknesses,
9. Environment is built on actual student needs not only theoretical principle.
10. Accounts for educational, cultural, social background, physical and sensory impairment, mental well-being,
11. All aspects are fully accessible - environment, resources/equipment, teaching, learning and assessment.
12. Students with disabilities/difficulties treated with as little difference as possible. Learners with disabilities/difficulties to be seen as the norm.

Discussion

Respondents felt that HEPs needed to adopt Whole Institution (WI) approaches, implying top-level management involvement to allocate resources for institution-wide activities. Responses also identified that strong 'buy-in' was needed from academic staff to transition their 'deliverables' to greater accessibility, whilst ensuring that academic rigour was not compromised by these changes. Hence, a debate regarding the nature of academic rigour might be a *sine qua non* of any change process regarding delivering accessibility and its delivery. Respondents firmly believed that some teaching staff's defence of existing assessment methods or teaching delivery, with the statement "this's the way it's always been done!" should be challenged. Respondents also believed that ILEs could and should offer all students the range of support developed for those with SpLDs.

2. Management

Respondents highlighted the need for ILEs' implementations to be managed effectively, typical responses, by number of mentions, were:
1. HEPs' senior management to lead their ILE implementations,
2. ILE projects should be regarded as continual improvement programmes, not one-offs.
3. Heads of Departments need to believe in the idea of inclusivity in order to take their staff with them,
4. Inclusivity must run through the core of the organisation,
5. ILE projects need cross-department representation to ensure close interdisciplinary cooperation between academic, learning support, disabilities support teams, library and information technology functions,
6. Audits, learner feedback and honest assessments of current practice are important pre-cursors to identifying areas for change,
7. Internal discussion and identification of out-of-date attitudes and practices are important actions to support ILE projects,
8. HEPs must use the appropriate in-house expertise, rather than uninformed prejudice, to provide advice to ILE projects.

Discussion

Respondents saw leadership as vital in achieving ILEs, they feared its absence meant that ILEs could not be achieved, and learners would suffer. Respondents identified a number of key requirements for successful organisational change management, see also discussion regarding pre-requisites to achieving behavioural and social change through WI participation in (Waldersee & Griffiths, 2003):
1. Top level management commitment permeates the whole organisation,
2. Honesty displayed regarding the organisation's current position,
3. Realism exercised regarding organisational objectives,
4. Participation occurs across the organisation,
5. Appropriate qualified internal staff are used.

3. Technology

Technology was stated as a significant enabling force in ILE implementation, frequently the term Virtual Learning Environment (VLE) was used to encapsulate the totality of what technology could offer. Assistive Technology (AT) could also help meet different Equity Groups' needs, eg screen reader technology for visual impairment, inductive loop technology for auditory impairment. The following non-exhaustive lists, each ordered by number of mentions, were suggested by respondents as necessary technology components of ILEs:

Online resources:

1. Virtual Learning Environments (VLE) and the content therein (eg pages, documents) designed with accessibility in mind regarding structure, layout, colours, graphics,
2. Multi-media technologies available to academic staff,
3. Academic staff trained in use of multi-media technologies,
4. VLE availability 24/7; prior to course start and during vacations,
5. Flexibly formatted materials to allow colour/font change, enlargement,
6. Training for students in using/navigating their HEPs' VLEs.

Lectures:

1. Video recording all lectures as standard (lecture capture),
2. Playback available 24/7,
3. Lecture recording to be quickly online post-delivery,
4. Handouts available at least 24-hours prior to delivery,
5. Multi-media equipment available in all lecture theatres.

Seminars/small group working:

1. Audio recording as standard,
2. Playback available 24/7.

Books/online books:

1. Reading lists available well beforehand,
2. As many texts as possible in computer readable form to allow text-to-speech capability,
3. Reading lists to identify core vs additional texts,
4. Reading lists to focus learners to specific sections of the texts,

Campus resources:

1. Text to speech software, speech to text software, planning tools (eg concept mapping) freely available on campus PCs,
2. Screen colour change, font change, background colour-change available on all campus PCs.

Discussion

Respondents were clear regarding the significant role of AT on-campus, especially in meeting different Equity Groups' specific needs. However, such clarity was missing regarding technology use off-site eg during placements for which no suggestions were offered. Respondents stressed that design to ensure accessibility of the electronic 'container', eg VLEs and online materials, was as important as the content itself. To achieve this accessibility design staff would need training in the characteristics of accessibility and SpLD students' needs. Learners, too, would need initial and refresher training on how to best use the technology to their benefit.

With the above list fully implemented, residual issues may still exist, eg, not all e-books are 'text-to-speech-readable', some books are 'locked' for copyright reason. Academics may worry about protecting their intellectual property, when their materials are online. However, some HEPs were reported as having fully embraced lecture capture and other technology support, including providing advice and training for academics (St. George's, University of London, 2017). However, respondents noted that whatever technology is deployed, the understandability of lectures captured in a VLE still depended on delivery quality, the accessibility of the contents and how the images/sound so captured interacted with accessibility software.

4. Design of course specific materials

Respondents identified accessibility features covering teaching delivery, eg lectures, supporting materials, eg slide available in PowerPoint format not Portable Data Format (PDF), lecture recordings of lectures. Departmental heads' involvement was key to successful delivery plus audits of current materials. Suitably trained and supported academic staff would originate the new materials. Respondents suggested less emphasis on pure lecture format as the main teaching method was desirable. Key features to deliver accessibility were:

1. Standard, consistent, well designed, accessible format used cross-institution,
2. Academic staff to assume diverse learners, different Equity Groups, will always be present in their cohorts, so design materials and delivery accordingly,
3. Teaching, associated delivery and materials are multi-sensory: visual (image), visual (text), auditory, practical, imaginative,
4. Feedback loops to exist between teachers and taught,
5. 'Good' material available online as podcasts,
6. Online versions of all content available beforehand and afterwards,
7. Clear overviews, signposting, summaries used in all delivery and documents,
8. Lectures clearly given and materials well-written,
9. High quality reproduction within handouts/slides,
10. Long lectures/seminars to include breaks.

Discussion

For every element of their teaching academic staff should design and implement their deliverables with accessibility at their core. Knowledge of the range of accessibility requirements, that is of Equity Groups' needs, was crucial to good design of materials. Standardised designs (templates) should be available to academic staff to lower barriers to usage and speed the creative process. Respondents also stressed the importance of involving the HEPs' disability support teams to work together to determine the nature of accessible materials. Academic staff needed both to accept the existence and impact of learning disabilities. Such materials' redevelopment implied significant commitment and

workload, therefore those engaged in the process would need to least to accept the need for accessibility, at best enthusiastically embrace it.

5. Assessment design

Over half of respondents stated the need to make assessments accessible in content and physical environment, the term 'assessment' covered both course work and examinations, eg:

1. HEPs offer multiple forms of assessment to allow learners to demonstrate their abilities with their course content not merely their ability with the assessment method,
2. Learners able to choose their preferred method,
3. Assessment methods need to be justified, not just habit-based, whilst mindful of fitness to practice issues,
4. Assessments to be flexible on time, whilst mindful of fitness to practice issues,
5. Design and validation of assessment to ensure no student is disadvantaged due to their SpLDs,
6. Accessible assessments to be designed into courses not retrofitted,
7. Full, constructive and prompt feedback given for both course work and examinations to enable them to be learning opportunities see (Newman, et al., 2018),
8. Examination rooms to ensure broadest conducive environment eg non-flicker lighting, minimum distractions, comfortable temperature, airflow and openness, non-echoing environment.

Discussion

The respondents' roles as Specialist Study Skills tutors or as holders of management positions within HEPs' disabilities support teams had given them experience of HEPs' assessment methods which had disadvantaged learners with SpLDs. They cited purely essay-based and Multiple-Choice Question formats, and the issues connected with persuading academic staff of their disadvantages and in arranging suitable alternative arrangements.

6. Design of non-course specific services

Respondents saw that ILEs needed non-course specific services and their supporting materials to be available for all students, eg:

1. General study skills tuition,
2. Strong transition support for those entering the HEP, whether from the school system or as mature learners, see also Nelson and Kift (2005); Kift (2009); (2015),
3. Tuition in academic English and structuring academic work,
4. Focussed tuition for students in using and taking advantage of the features of the HEP's particular ILE implementation,

5. Academic coaching for students who have missed out, for whatever reason, on underlying knowledge and skills,
6. Library staff available for people-based support.

Discussion

Making course content, the teaching thereof and assessments more accessible for the different Equity Groups were seen as necessary but not sufficient elements in students' academic success. Knowing how to study, how to express knowledge and exercise critical thinking were considered fundamental academic skills, but not always present or strong. Respondents identified WP in HE as attracting learners from less traditional backgrounds, mature returners, non-English mother tongue and international students thus necessitating tuition in the 'how' of learning, see S.3.3. Respondents also felt that the benefits of the specialist one-to-one tuition, ie NMH support, available only to disabled students, should be available for all.

7. Academic staff awareness, training and attitude

Respondents recognised that significant work was required by academic staff to achieve accessibility in their teaching, yielding a list of somewhat detailed suggestions:

1. All teachers should assume that in all lectures, and in all forms of student contact, there will be people with SpLDs, hearing/visual impairments and other learning diversity,
2. Training needs to be given, initially and ongoing regarding:
   a. The nature of SpLDs,
   b. How people learn, impact of SpLDs on learning emphasising issues relating to impaired auditory and visual working memory, slow processing speed, deficit in visual perception, visual stress, short attention span, distractibility, slowness gaining automaticity,
   c. Creating multisensory materials and best practice in so doing,
   d. Pacing delivery,
   e. Outlining, summarising, 'chunking', signposting, importance of breaks,
   f. Ensuring clarity in speech and writing, keeping to plans/schemes of work/room allocations/times/deadlines, being unambiguous,
   g. High quality, comprehensive, formative and constructive feedback mindful of socio-emotional issues, see (Newman, et al., 2018),
   h. Importance and ways of maintaining learners' self-esteem,
   i. Importance of accessible materials, such as software readable e-books, lecture/seminar notes and recordings available beforehand and afterwards,
   j. Individual and organisational obligations under the Equality Act (2010).

Discussion

Respondents were clear that academic staff held the primary responsibility for effective teaching methods. However, they acknowledged that some academics were sceptical about the existence of SpLDs which could affect the empathy with which they accommodated those learners (Elliott & Grigorenko, 2014a); (Elliott & Grigorenko, 2014b). Notwithstanding such scepticism, helping academic colleagues understand the nature of Equity Groups'

needs was regarded as important. The term 'academic staff' was taken as referring to all engaged in imparting knowledge to or supporting the assessment process of learners, from professorial department heads to Graduate Teaching Assistants.

8. Wellbeing support environment

Respondents identified benefits from extending to all students the support mainly available only to SpLD students under DSA, they suggested:

1. All students are offered a baseline assessment to determine their learning needs,
2. All students who wish it to have access to specialist individual learning support within a personalised approach,
3. Needs additional to those provided by an ILE are professionally assessed, following the DSA model,
4. Further Specialist Study Skills support is available to those with a disability diagnosis,
5. Opportunities exist to recap study skills at each learner's own pace,
6. Delivery teams and student wellbeing services to work closely together for each learner's benefit,
7. Mentoring of 1st year students is offered by final year students; study buddies [colleague with whom students work closely] for all, see (Kift, 2009),
8. Existing disability/wellbeing services staff to be used as in-house resources to train, advise and assist the HEP in implementing its ILE.

Discussion

Respondents recognised that each learner, for multiple reasons, has preferences in the way they learn and saw an ILE as having the potential to enhance everybody's learning experience. However, ILEs would still require specialists who could provide all students with the learning support they required, at a pace they could absorb, with the repetition required to gain automaticity and the empathy to handle the socio-emotional aspects of experiencing study difficulties.

9. Built environment

Respondents identified that SpLD characteristics and co-occurring issues, eg sensitivity to visual stimuli, being easily distracted needed addressing, suggesting:

1. Non-flicker/natural spectrum lighting installed, eg in libraries, quiet areas, lecture rooms, seminar rooms, practical labs,
2. Quiet areas available and enforced,
3. Clear and unambiguous wayfinding signage,
4. Rooms laid-out with knowledge of SpLD issues,
5. Appropriate seating variety.

Discussion

Respondents' based their suggestions on their knowledge of SpLDs noting that although their suggestions might appear trivial, for those with the SpLD issue they could have significant negative effects on studies. For example, attendance assumes students can find room locations on potentially complex floor-plans or in previously unknown buildings, flickering lighting or ambient noise/movement can distract, a single style of seating may not suit all with consequent discomfort proving a distraction, room layout (eg round-tables) which requires some to have their backs to the speaker or board disadvantages those with impaired visual working memory (Mortimore, 2003); (Heaton & Mitchel, 2001). None of these issues is necessarily difficult to solve given anticipatory awareness of Equity Groups' needs and duly planned solutions.

SpLD issues not addressed by an ILE

Respondents suggested ten areas where issues would remain for SpLD learners despite there being ILE. Note that the ILE which respondents had in mind was one of their own conception, a number commented on the absence of an accepted model, no defining statement was provided as part of the study:

1. Impairments in cognitive and literacy abilities, life and study skills,
2. Challenges presented by assistive technology,
3. Co-occurring learning difficulties,
4. Socio-emotional and mental health issues,
5. Transition into university,
6. Need for accessible assessment formats.

These are discussed below, for further explanation see Nature of SpLDs, S.3.2.2.

a. Cognitive abilities

Respondents identified the measurable and typical characteristics, and profile of SpLD students when compared to peers: slower processing speeds, less effective working memory, shorter attention spans, less effective attention, extended times gaining automaticity, weak sequencing abilities and the need for study skills strategies together with overlearning to 'anchor' them (Jones & Kindersley, 2013). With the uniqueness of each SpLD diagnosis respondents believed it unlikely that ILEs would address some combinations and severity of issues plus their interplay with students' academic courses without additional specialist support. This observation somewhat reflected an aim of the Modernisation, to 'reserve' DSAs for issues remaining after mitigation by ILEs, see 2.1.

b. Literacy abilities

Respondents noted that learners with the SpLD of dyslexia typically needed considerable support in grammar, syntax, spelling, sentence/paragraph/essay structuring with which their education to date had been unable to furnish them. Respondents' mentioned that

these areas of literacy skills deficits were not always effectively taught within HEPs, even if such co-curricular support were available. They further observed that DSA-funded one-to-one specialist support model had sometimes been the only way to address the difficulties. Problems were exacerbated when learners had experienced previous poor educational outcomes, possibly due to their SpLDs, meaning that they commenced their HE with a lowered base of literacy skills (Kift, 2009). Respondents' noted that SpLD learners gained their HE literacy skills through patient teaching done at their own pace of learning over an extended time.

c. Life skills

Respondents noted that an individual's time management, planning, organisation and execution of work were abilities which an ILE might not address. As with life more generally, achievement in HE was seen as depending on individuals' abilities to organise themselves and their studies; disorganisation is often characteristic of SpLDs.

d. Study skills

Respondents identified that developing critical thinking skills, structuring, sequencing, connecting ideas, contextualising tasks, finding/using references appropriately, reading and notetaking techniques typically required significant demonstration, explanation and repetition for SpLD students. Respondents felt strongly that these issues would remain despite ILE implementation, noting SpLD students' need to work self-paced and in their own way. They felt that ILEs might be structured and paced at the speed of the many, not the few. Respondents identified that SpLD students would need to know how to navigate their ILE to benefit from it.

e. Assistive technology

Respondents noted that VLEs offered potential benefits to all. There was no standard idea of a VLE, but potential issues of human interface and organisation, effective ways of presenting visual and textual navigation were mentioned. Respondents pointed out that whatever AT was implemented, learners would, self-evidently, need to be able to use it. For some learners with SpLDs, gaining automaticity in such usage could be slow. Respondents also identified that elements of AT might not work for individual students; an ILE would need to supply alternatives. Some reported that different AT might not work together, eg some e-book formats block text-to-speech software used by SpLD students, eg Texthelp, ClaroRead and Read/Write Gold[24]. Some also noted issues with teaching staff worrying about intellectual property rights, confidentiality or other issues leading to reluctance or refusal, to allow lecture or small group recording.

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[24] Texthelp: https://www.texthelp.com/en-gb/sectors/education/dsa/ , ClaroRead https://www.clarosoftware.com/portfolio/claroread/, Read/Write Gold https://www.dyslexic.com/product/read-write-gold-for-windows-dsa/

f. Co-occurring learning difficulties

Respondents identified that SpLDs presented on a spectrum, frequently co-occurring leading to potentially complex combinations of difficulties. Additionally, as each student's SpLD profile was unique, predicting consequent impacts on individuals' academic work was problematical. Hence, ILEs' abilities to meet these co-occurring and complex needs was questioned. Recognition of such complexity was believed less understood by academics than single diagnoses, eg dyspraxia, dyslexia.

g. Socio-emotional and mental health issues

Respondents identified that some socio-emotional and mental health aspects of SpLDs would remain even with an ILE, mentioning that people with SpLDs frequently possess low self-esteem, low self-belief and high anxiety levels. Additionally, they noted that some SpLDs, for example Autistic Spectrum Condition (ASC) and dyspraxia, caused problems in social interactions. Respondents worried that without effective pastoral care such issues could progress to mental health problems.

h. Transition into university

For students entering HE from either secondary schools or as mature learners, respondents identified that learners' prior educational experiences might have been poor and therefore learners with SpLDs could be at a double disadvantage. Respondents questioned how ILEs might support learners that twin problem. As one respondent stated, "if they are behind at the beginning they will fall further and further behind as they go on". Respondents also suggested that, for those previously attending a highly supportive school, which for example provided effective specialist one-to-one support, the transition to an ILE, which did not deliver one-to-one support, could be difficult. Making transition into HE more effective was the key aim of the Australian FYE initiative, (Kift & Nelson, 2005); (Kift, 2009).

i. Accessible assessment formats

Diagnostic assessment reports for students with SpLDs frequently recommended that the student be allowed 25% extra time in examinations to compensate for such issues as slow processing, slower comprehension, reduced working memory (DfES, 2005). Additionally, some HEPs, did not assess written work for spelling. Some respondents reported progress with alternatives to written format assessment, even in traditional subjects with long histories of written submissions, similarly with timed exams. Against this background, respondents questioned how, within ILEs where students might not 'need' a diagnostic assessment report, such reasonable adjustments could be accessed. Some respondents worried that assessment formats might be used more from habit than because they tested knowledge effectively. Respondents acknowledged that in 'fitness to practice' assessments time constraints and format might need to be more rigidly specified.

Barriers to an ILE

Eight themes emerged regarding barriers to implementing ILEs, in descending order of number of mentions:
1. Need for and extent of training,
2. Academic staff attitude,
3. Financial resources,
4. Time availability,
5. Need to work cross-functionally/use all internal resources,
6. Need for leadership,
7. Challenge of creating inclusive courses,
8. Facilities constraints.

Based on their individual concept of ILEs, respondents assumed that much of the responsibility and workload for ILEs' design, implementation and delivery would lie with academic staff and their leadership:

1. Need for and extent of training
Respondents recognised that all HEP staff, particularly academic, needed wide-ranging training, at the least in:

1. Understanding SpLDs - their causes, consequences for study and socio-emotional wellbeing and strengths of students with SpLDs,
2. Teaching modifications to become more inclusive of SpLDs,
3. Designing inclusive teaching materials,
4. Pacing teaching to be inclusive,
5. Using technology to make course materials accessible,
6. Designing accessible assessment methods.

Discussion

Most respondents held post-graduate qualifications in supporting adults with SpLDs (54 were NMH providers or support workers and Specialist SpLD Diagnostic Assessors, for which a post-graduate qualification was required), their own training informed the above training suggestions for academics. Respondents noted, see below, that HEPs might not have used their own in-house expertise effectively to train academic staff and others to develop ILEs. The issue of visiting and guest lecturers also existed, and the extent to which their teaching might be inclusive remained unresolved.

2. Academic staff attitude

Respondents identified six themes within academic staff's attitude towards inclusivity generally and particularly SpLDs:
1. Scepticism about SpLDs' existence,
2. Lack of empathy for teaching inclusively,

3. Lack of desire to accommodate SpLD students,
4. Belief that teaching inclusively equals 'dumbing down',
5. Not seeing pursuing inclusivity as 'their job',
6. Lack of belief that anything needs to change.

Discussion

In this potentially contentious theme respondents' views appeared based on experience of working with academic staff. Although most academic staff seemed at least willing to discuss the SpLDs' nature and study impacts, respondents told of those who, whilst holding no expertise in the area, were sceptical about their existence, some, according to respondents' narrative, to the point of denial. Respondents identified a wider lack of empathy leading to a lack of desire to teach inclusively for two reasons, academics' belief that they were employed to teach rather than pursue an inclusivity 'agenda', despite their HEP embracing WP. Second, some academics believed that easing difficulties in learning equated to 'dumbing down' academic rigour. Numerous respondents reported that they felt disempowered by their line management, or department's organisational positioning to challenge academic colleagues.

3. Financial resources

Financial resources were seen as vital in achieving ILEs but that cuts in an era of austerity [post-2008 financial crisis] could lead to an inability to
1. Fund additional staff, training & consultancy to develop new, inclusive course material and systems/services,
2. Fund AT hardware and software,
3. Ring-fence allocated monies from needed 'urgently' elsewhere.

Discussion

Respondents felt existing staffing and material resources were insufficient to cover ILE development given academics' current teaching and non-teaching workloads, eg the REF (HEFCE, 2014), and TEF, introduced from 2016, (HEFCE, 2017a). Respondents doubted that HEPs would be willing to reallocate budget from elsewhere to develop ILEs, especially given questions about HEPs' leadership commitment to inclusivity, see below. Financial pressures were, however, acknowledged by HEFCE, which increased the Disability Premium granted to HEPs from £20-40m pa from AY 2016/17 (HEFCE, 2016a)

4. Time availability

Respondents identified time dependencies relating to ILE development, eg:
1. ILE whole project duration – change identification, materials & methods development, change implementation, measurement tool development,
2. Allowing academic contribution at each project stage, especially in developing new materials and assessment methods,

3. Training project participants at each project stage,
4. Revalidating accessible course materials, delivery methods and assessment methods, whole programme (course).

Discussion

Respondents identified potentially irreconcilable issues. Implementing ILE from concept to operation would require significant amounts of academics' time but their time was already fully allocated. This conflict worried respondents as the implementation date for the major DSA changes was only a year hence, and HEPs had not previously demonstrated agility in implementing major changes within similar timescales.

5. Need to work cross-functionally and use qualified internal resources

Respondents drew on personal experience providing illustrations, eg:
1. Many decisions were taken without good understanding of their impact on SpLD students,
2. Disability services and academic departments were not working collaboratively,
3. Academics refused to take the specialist advice,
4. Whole institution planning for inclusivity was lacking,
5. Changes in one area, eg assessments, had not always been thought through regarding administrative consequences,
6. Inclusivity was not embedded uniformly across schools/departments/courses.

Discussion

To pursue ILEs HEPs would need to identify desired endpoints, determine necessary changes, develop 'deliverables', implement them and monitor to provide feedback before iterating the process. HEPs probably had three choices in making that 'journey'. Members of its management could assume they knew what had to be done and implement those changes, or it could buy-in proven expertise, assuming it existed, or it could ask its own qualified, existing in-house experts. Respondents fervently wished, for the sake of their SpLD students, that the last option would be taken, however, they feared it would be the first.

6. Need for leadership

Respondents recognised that ILEs required WI change and thus needed 'top-down' drive. For successful ILE implementation HEPs needed:
1. Engagement from the HEP principal down,
2. Senior management's commitment and focus,
3. Ways of overcoming institutional inertia,
4. A culture which embraced inclusivity, not just 'tick[ed] the boxes',
5. Trust between academic departments and in-house expertise.

Discussion

Respondents were concerned about short timescales to deliver ILEs given the Modernisation's reduced DSA funding from AY2016/17. Disabilities' support teams were frustrated, having to push hard through hierarchies, entrenched positions, lack of trust and general slowness to gain attention for managing the Modernisation's consequences. Some commented on competition with existing organisational changes. Some respondents noted they used the anticipatory Public Sector Equality Duty (PSED) requirement of the EA (2010, S.149) to 'push' the importance of addressing the Modernisation's changes (BIS, 2014c, p. 8).

7. Challenge of creating inclusive courses

Respondents identified four main concerns in developing inclusive courses, the need for:
1. Academics' to understand the nature of inclusive courses and ways of achieving them,
2. Academics to look at all materials and delivery to determine where detrimental impact might lie for Equity Groups,
3. All pedagogic methods within courses to be investigation and potentially modified,
4. Teaching to be paced for a wide range of underlying cognitive abilities,

Discussion

Respondents were acutely aware of the challenge of creating inclusive courses; they reported seeing SpLD students daily who struggled with their academic work, existing course materials and teaching methods. One challenge for HEPs lay in how to anticipate the ways in which existing courses might cause detriment to Equity Groups, eg SpLDs, and the need to redesign those courses to remove the detriment; no assumptions should be made about what constituted being inclusive without understanding how existing approaches caused exclusion.

8. Facilities constraints

Respondents identified physical environment constraints affecting SpLD students' co-occurring impairments, including:
1. Issues with lighting - flicker and frequency spectrum,
2. Lack of genuine quiet spaces free from distraction, especially during examinations,
3. Availability of suitable confidential space for one-to-one tutorials and mentoring.

Discussion:

Respondents felt that removing such constraints might be problematical for HEPs when considering balancing costs-benefits for what might help only a minority of students. However, set against cost was the Equality Act's (2010) clear requirement to anticipate and make such reasonable adjustments.

5.1.3. Conclusion

This study demonstrated that practitioners supporting SpLD students viewed the idea of ILEs very favourably regarding the potential for responding to their SpLD learners' needs, as an Equity Group. They envisaged ILEs as potentially benefitting all students through sharing good practice developed for SpLD students. However, whilst the promise of ILEs existed, respondents were unsure of their theoretical and practical extent, they did not identify an implemented model or models from which reliable evidence could be analysed.

Responses in this study potentially resembled a 'shopping list' of desirable characteristics however, practical constraints to their achievement existed. Foremost limitations were:

1. The implied workload and training imposed on academic staff,
2. Academic staff's willingness to embrace inclusivity,
3. An HEP's leadership's ability to use all the expertise at its disposal,
4. Financial resources, notwithstanding HEFCE's doubling of the disability (announced after this Study), to help "[English] institutions to transition towards an inclusive, social model of support" (HEFCE, 2016a, p. 4).

Respondents knew that HEPs were moving at different speeds and to different extents. Reaching the ILE 'destination' would therefore occur differentially by time, extent and HEPs, potentially leading to sector-wide inconsistencies. This inconsistency contrasted with the single date of implementing the Modernised, and reduced, DSA provision from AY2016/17. Hence, gaps in provision of support for SpLD learners could be anticipated, potentially compromising the achievement of improved accessibility for "all disabled students" envisaged in the Consultation's paragraph 39a (BIS, 2015a, p. 11).

Respondents saw ILEs as potentially improving the position of SpLD students. However, each person's unique learning profile, as diagnostic assessments revealed, seriously challenged the idea that ILEs might sufficiently address the complex interactions of SpLDs and studies to deliver a significant reduction in the requirement for patient, skilled one-to-one specialist support, as funded under DSAs.

5.1.4. NADP workshop, June 2016

Workshop results summary

Following the study and BIS consultation, the author held a workshop at NADP's 2016 annual conference, presenting a research précis based on the nine identified themes of an ILE, see 5.1.2.2 to 28 self-selected delegates, see 4.4.1.3 for this workshop's methodology.

The workshop demonstrated that creating ILEs required multi-year, multi-level efforts. Successful strategies included gaining executive management buy-in, course validations to include an assessment of courses' inclusivity and working cooperatively with cross-departmental allies. Frustrations included academic staff's absence of recognition of learning differences and worries about placing audio/video recordings online, patchy

compliance with institutional policy on lecture recording and difficulties with older buildings' accessibility. Nevertheless, participants were enthusiastic about their successes and ability, over time, to meet the challenges they faced.

5.1.5.   Successful ILE Initiatives

Delegates identified that, although disagreeing with the manner of their introduction, the Modernisation's changes to DSA had "catalysed the ILE agenda", particularly the announcements' statements about HEPs' anticipatory PSED to make reasonable adjustments (BIS, 2015c); (BIS, 2016). HEPs could neither ignore nor avoid their legal obligations.

Philosophy/Mission

Successful Philosophy/Mission initiatives included:
1. An academic standards committee included 'Inclusive Practice' in all policies,
2. All course validations and reviews to include inclusive practice as a standard requirement,
3. A 'two-pronged' approach taken to implementing inclusive practice involving policy changes followed by providing support to academics in implementing the changes. The policy changes were based on the observation that academics changed behaviours only when obliged to, leading to an assessment of courses' inclusivity being included, as a matter of policy, in validation procedures. However, the next phases in supporting academics achieve greater inclusivity were yet to be implemented - gaining compliance and a successful outcome.

Leadership

Numerous delegates reported success in this component:

1. One HEP's Vice-Chancellor directly supported inclusive practice whilst at another the academic review of competence standards included that of inclusive practice,
2. Two HEPs had advanced their approach to assessments. The first changed its approach to granting examination accommodations, eg granting 25% extra time for students with a diagnosis of SpLDs, from requiring annual renewal to being granted for the total duration of the course of study, saving considerable management time and student anxiety. In the other, policy agreement about alternative assessments was gained to ensure clarity and uniformity for both staff and students. This success was achieved cross-departmentally with the disabilities team providing input into the policy writing.

Management

Successful initiatives included:
1. Improving staff awareness about diversity was one HEP's objective in their appointment of a Disability & Equality Trainer. Initially, this involved only training the Executive Board prior to a wider roll-out both bespoke and generically,
2. Another HEP, which had previously managed its response to disabled students through its Registry and Admission team appointed a Disability Coordinator,
3. A third delegate reported progress by academics in managing the early availability of their lecture material via the VLE,
4. Delegates also talked about success when working with colleagues in other departments, potentially sharing budget to fund initiatives.

Course Materials' Design, Including Assessment

This theme was the most frequently mentioned, including:
1. Making course material upload, especially lectures, typically 24-hours beforehand in their respective module pages withing the VLE, a matter of policy and lecturers' compliance thereto. One delegate recalled early success at putting lecture materials online through identifying printing costs and difficulties of transporting lecture slide handouts. Hence, making business cases for inclusive practice projects was identified as useful. Some noted they did not have this skill but could work with colleagues. However, business cases alone were insufficient, individual persuasion was also required,
2. One HEP in a successful response to resistance to all 1st year lectures being recorded provided cross-functionally delivered support to academics, eg by making the recording process automatic and in editing recorded materials,
3. Success was more certain when the pace of implementation was slower, and lecturers were supported in making the changes,
4. One HEP used an 'Inclusive Checklist' to help lecturers prepare for validation/revalidation,
5. Lecture capture was identified as a nascent technology which some lecturers embraced, others remained very wary, one delegate reported success,
6. Closed captioning with audio-visual materials was also cited as a success,
7. The provision of individualised timetables allowing students to see clearly which sessions they should attend, when and where was successfully implemented,
8. One business school's open book assessments were conducted online over a 3-day weekend. To remove the pressures of a short duration exam, students could take as long as required, but submission time was immovable.

Non-Course Specific Materials Design

At one HEP, students and staff benefitted from automatic library renewals removing the need to request extensions or appeal against fines. This policy demonstrated a proactive and responsive learning resource centre which delivered both inclusive for all.

Academic Staff Awareness, Attitude, Training

This theme was considered important in winning 'hearts and minds' across HEPs:

1. One delegate described holding a *Disability Awareness Month* involving academics and students who had disclosed their disability and the remainder of the university population, helping the latter understand the heterogeneity of Equity Groups' needs. The initiative led to increased deployment of lecture capture and accessibility adjustments,

2. At another HEP, academics were asked, "How inclusive are your courses?" as the theme for academic health reviews - annual course reviews and reports. Hence all module leaders had to consider their modules and the possibilities for change,

3. Success was reported in achieving academic staff's understanding that in addition to written assignments posing challenges, practical assessments also posed challenges for disabled students and that extra time should be considered and granted where justified.

Other & Built Environment

One delegate reported the installation of certain AT on all its Windows PCs and Apple MACs whilst another had 'got ahead' of start of year pressure by ensuring individual adjustments were put in place for applicants prior to arrival on campus. This action reduced numbers of students missing out on support at the start of their studies, a smoother transition into study and less need for interaction with Disability Services at the peak period, see Australian FYE initiatives (Nelson & Kift, 2005); (Kift, 2009).

An accessibility programme was successfully delivered which made a property estate PEEP (Personal Emergency Evacuation Plan) compliant, including old buildings resulting in access for all.

5.1.6.   ILE Initiatives which were frustrated

Delegates identified frustrated ILE initiatives, those whose objectives were not met due to unanticipated, usually external, circumstances. Frustrated projects would quite likely occur across the sector although the examples in this study applied only to a single or a few HEPs. However, they reflected respondents' concerns regarding the way these frustrated projects had impeded progress to ILEs.

Philosophy/Mission

Some delegates reported their colleagues "still distinguished" between 'disabled groups' and other students, showing little understanding that all cohorts were diverse. At some HEPs academics worried about the time and effort required to address a small group of [disabled] students, not acknowledging that inclusive practice might benefit all. A number mentioned that they felt that disabled students' needs had been overshadowed by WP initiatives, see Gale's (2009a) similar worry in Australian HE.

Leadership

Delegates gave examples of where the need to formalise good practices was important but was absent from senior managements' agenda. Conversely, examples of inclusive practice were cited as achieved without senior management leadership. At one HEP a senior management 'inclusive practice' group remained unappointed for over 4 months.

Management

Ineffective cross-department or cross-institution working was highlighted as frustrating increased inclusive practice, eg the absence of planning lecture capture facilities into a refurbishment programme.

One HEP's senior management sought sector-wide evidence that lecture capture yielded positive outcomes. Similarly, where lecture capture was installed some academics refused to use it without evidence of its utility, without which progress was blocked.

Some senior management's view that AT only benefitted disabled students was also reported as frustrating initiatives aiming for campus-wide implementations, where managements wanted more limited installation on PCs designated for disabled students, ie those with Teaching and Learning Plans.

Course Materials' availability

Delegates reported several frustrated projects:
1. Although placing lecture and other course materials online was t a key element of ILEs some lecturers believed they owned their materials' Intellectual property (IP) rights, refusing to place them online, even within a VLE controlled environment,
2. Some academics felt that recording lectures constrained them, eg from making jokes, which might be later used against them. Fear of videos of lectures appearing on social media and the possibility of litigation also frustrated initiatives,
3. An example was given of academics refusing even to allow individual students to use digital voice recorders [likely funded by DSA] in their lectures despite their HEPs' policies and the need to make reasonable adjustments under the Equality Act (2010),
4. Delegates reported that some academics worried about students skipping lectures if slides were available beforehand, whilst other academics regarded lecture materials in advance as lowering academic standards by 'dumbing-down',

5. Insufficient time was also given as a reason not to place notes online, a point also made regarding material on the VLE content becoming out of date hence needing constant updating,

6. Visiting lecturers' materials also present problems having to be placed in their host HEP's VLE, potentially only at the last minute.

Reluctance to embrace elements of inclusivity was met by delegates engaging with academics to answer their concerns and asking them how they would meet individual student's needs if they were not willing to, for example, record their lectures or put lecture notes online beforehand. One delegate described a positive outcome from this dialogue. In discussion with academics who baulked when told they had to implement HEP-wide lecture recording, they showed themselves to be receptive to understanding the needs of individual disabled students and amenable to making adjustments for them.

Built Environment

Delegates reported that not all Estates departments accepted that their HEPs lacked accessibility. Older buildings, especially listed ones, gave physical accessibility problems, some rooms simply remained inaccessible, one delegated reported that not all students at his/her HEP could attend all taught activities. Problems also arose when timetabling forced accessible rooms to be replaced by inaccessible ones. Absence of the 'disabled voice' in refurbishment planning was blamed for hindering progress towards inclusivity. See Newman & Herbert (2019, pp. 52-53) for an example of an HEP's inaccessible estate.

5.1.7. Workshop Conclusion

Other than persistence, no single 'silver bullet' strategy existed to progress towards ILEs. Senior level 'buy-in' and support were vital plus 'flow-through' of inclusivity issues into policies and implementation. Major cost items, eg to create accessible premises or installing lecture capture required business justification. Implementing ILEs depended on many individuals, especially academics delivering individual pieces, hence effort was required to engage with all those making changes to discuss and meet their doubts, worries and need to master technologies to minimise additional calls on their time. Cross-functional, cooperative working with colleagues and sharing of ideas, potentially also of budgets was vital. Somewhat surprisingly, even some 4 years after this study, Williams' et al. (2019, p. 4) Office for Students (OfS) research suggested that involving different parts of HEPs in inclusivity projects, including students, might be 'innovative'. However, the DSA Modernisation, whilst potentially causing short term difficulties, was seen as helping focus HEP's attention on the need to pursue greater inclusivity in their learning environments.

This study successfully identified ILEs' characteristics which were then used to inform later studies in this research, specifically Studies 3, and 7/8, S.5.3 and S.5.7, respectively.

5.2. Study 2: Establish baseline of effects on NMH providers; investigate restriction on using RWTs

5.2.1. Response

5.2.1.1. Respondents by Role

The mixed method, semi-structured online questionnaire was answered by 73 respondents, the most frequent of whose role was that of Specialist Study Skills Tutor (NMH support worker), 60; 20 held multiple roles, Table 14 and Figure 21 present the demographics in both tabular and chart format, respectively.

Table 14: Establishing Baseline - Number by Respondents' Role	
Respondent Role	**Number of Roles Responding**
Specialist Study Skills Tutor	60
Specialist SpLD Diagnostic Assessor	11
Specialist Mentor	8
Disability Advisor	7
Manager/managerial position	5
Assistive Technology (AT) Trainer	2
Needs Assessor	1
Other	1

Figure 21: Establishing Baseline - Numbers by Respondents' Role
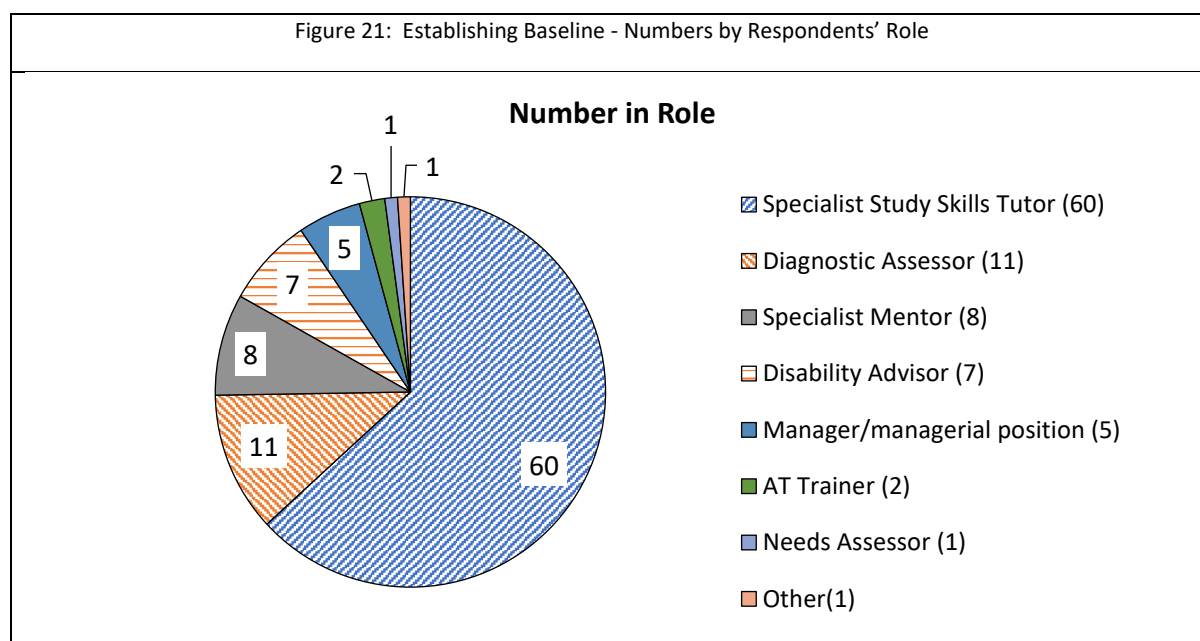
5.2.1.2. Respondents by HEP

The respondents' students studied at 94 HEPs across England (88), Wales (5) and Scotland (1), their size ranged <5,000 - >35,000 students (both under and postgraduate). Of the 88 English universities, 26 were pre, 62 post-1992 institutions (OfS, 2018a).

5.2.1.3.   Employment status

Respondents' employment status varied, some held multiple roles, Table 15; 39.7% (29) were employed directly by HEPs, 15.1% (11) were contracted by HEPs to supply support services, 34.2% (25) were contracted to agencies, delivering support through them, 46.6% (34) regarded themselves as freelance (they were NMH providers in their own right) and 2 held other capacities, eg Needs Assessor.

Table 15: Respondents' employment status n=73 multiple answers allowed				
Employed by HEP	**Contracted to HEPs to supply support services**	**Contracted to an agency to supply support services**	**Freelance (NMH provider in own right)**	**Other**
39.7% (29)	15.1% (11)	34.2% (25)	46.6% (34)	2.7% (2)

5.2.1.4.   Establishing baseline of effects of DSA changes

Flow of student referrals

Respondents were asked "Comparing this academic year to last academic year how has the number of students referred to you changed?" Many more were reported by 5.5% (4), slightly more by 27.4% (20), no change by 35.6% (26), slightly fewer by 24.7% (18) and many fewer by 6.8% (5), Table 16.

Table 16: Number of student referrals received. Comparing current AY2015/16 to prior year n=73				
Many more	**Slightly more**	**No change**	**Slightly fewer**	**Many fewer**
5.5% (4)	27.4% (20)	35.6% (26)	24.7% (18)	6.8% (5)

Narrative responses suggested that those reporting many or slightly more were likely to be contracted to an agency whilst those reporting no change were likely to be HEPs' employees. However, some HEPs had made staff redundant and/or closed their in-house support, similarly some freelance providers had received fewer referrals as the 'two-quote' system, see Appendix 4, S.10, was enforced, hence reporting slightly or many fewer student referrals.

Modifications to practice due to the DSA changes

An open question asked, "What modifications have you made to your support delivery this academic year compared to last year because of the changes to DSA or the way DSA is administered?" All respondents answered, some with multiple comments totalling 83; emergent themes are summarised in Table 17. Whilst 28.9% (24) reported no change, their caveat was frequently "as yet". Both increased bureaucracy in tutorial record keeping and the need to adapt their delivery model affected all respondent categories. For nearly 11%, looking more actively at and/or embracing AT was a necessity, especially no cost licence free or open source software. A small number, 6.0% (5) were new to NMH support, or had recently moved organisations so lacked a comparative year.

Table 17: Respondents' narrative responses to question: "What modifications have you made to your support delivery this academic year compared to last year because of the changes to DSA or the way DSA is administered?" n=73 multiple answers allowed					
No change	**Increased bureaucracy volume or complexity**	**Changed delivery model, internal reorganisation**	**Other, eg increased training, promoting inclusive learning**	**Investigating/ using more AT, especially licence-free/ open source**	**Unable to comment**
28.9% (24)	27.7% (23)	19.3% (16)	10.8% (9)	7.2% (6)	6.0% (5)

Changes in way agencies deal with NMH support workers

Agency workers were asked, "What changes have you experienced this year in the way that agency deals with you?"; 100% (25) of declared agency workers replied, some multiply, Table 18. Lowered payrate was the foremost mention, 36.0% (9), rigid bureaucracy and unresponsiveness were second, 28.0% (7). Agencies had asked more about qualifications and professional memberships, 20.0% (5) and required support workers to attend more training 12.0% (3). Loss of dedicated tutorial space was mentioned, 8.0% (2), whilst the issue of dealing with different agencies' procedures and no change were each mentioned by 4.0% (1).

Table 18: Changes in the way agencies related to their NMH support workers n=25						
Lowered payrate	**Rigid bureaucracy and/or unresponsiveness**	**Required more information on qualifications and/or professional memberships**	**Required to attend training**	**Loss of dedicated tutorial space**	**Dealing with multiple agencies' procedures**	**No change**
36.0% (9)	28.0% (7)	20.0% (5)	12.0% (3)	8.0% (2)	4.0% (1)	4.0% (1)

Narrative responses from eight of the nine mentioning lowered payrate supplied figures which revealed cuts of 15-30% against an authorised "Band 4" [Specialist One to One Study Skills Support] of £50-72ph[25] (SFE, 2018, p. 65). Additionally, one reported that their agency had unilaterally reclassified, without professional or educational justification, some of their Band 4 Specialist Study Skills work at the Band 4 rate as Band 1 library support assistant work paid at £8ph (SFE, 2018, p. 54), notwithstanding that the student had been awarded Band 4 support funded at £50-72ph.

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[25] Hourly rates are taken from the AY2018/19 advisory document as the prior years' documents are no longer available.

Progress with delivery of an Inclusive Learning Environment (ILE)

A final open question to all asked, "In this academic year compared to last what progress has there been in the delivery of an Inclusive Learning Environment at your HEP/the HEPs whose students you tutor?" Responses divided broadly between those employed by HEPs or in a close contractual relationship for NMH support delivery who responded Much more, 4.1% (3) or Some more, 39.7% (29) and the remainder who reported No change, 19.2% (14), Little less, 2.7% (2) or had no information either way, 34.2% (25), Table 19.

Table 19: Narrative responses to question: "In this academic year compared to last what progress has there been in the delivery of an Inclusive Learning Environment at your HEP/the HEPs whose students you tutor?" n=73					
Much more	**Some more**	**No change**	**A little less**	**Much less**	**No information either way**
4.1% (3)	39.7% (29)	19.2% (14)	2.7% (2)	0% (0)	34.2% (25)

The 60 narrative responses identified the following themes:
1. Inability to comment due to lack of information or not being in role sufficiently long, 26.7% (16 of 60),
2. No change observed, although a belief that HEPs were actively discussing ILEs, 20.0% (12 of 60),
3. Lecture capture had been/was being implemented, participation was optional and compliance far from 100%, 11.7% (7 of 60),
4. Cross-functional groups had been formed to determine policy and propose projects 11.7% (7 of 60),
5. Multiple projects were underway, 11.7% (7 of 60),
6. Policy changes had been made or were actively under consideration, 10.0% (6 of 60),
7. Support was being given within departments to academics to understand and help deliver an ILE, 8.5% (5 of 60),
8. The Virtual Learning Environment (VLE) was being developed, 6.7% (4 of 60),
9. Alternative assessment methods were being discussed or adopted, 5% (3 of 60).

Discussion

This section of the study showed that the role of Specialist Study Skills tutors, one category of NMH support workers, was already changing regarding working practices in the academic year prior to the Modernisation's main changes' AY2016/17 live date. Except for work being done at HEPs on developing more ILEs, respondents' views about the changes were almost wholly negative; indeed, none suggested that the changes might practically benefit their disabled students. Key themes were:
1. Loss of work, both for Specialist Study Skills tutors employed by HEPs through downsizing or closure of in-house disability support teams, and independent suppliers no longer receiving referrals,
2. Lower rates of pay, particularly for those employed by agencies,

3. Increased bureaucracy with need to complete and keep significantly more student related documentation; more record keeping regarding professional qualifications,

4. Being subject to organisational change and change in delivery model to accommodate increased competition and/or to support an outsourced model, 3rd party provision, see Appendix 4, S.10,

5. Increased training to comply with new requirements,

6. Some HEPs were involved actively in developing ILEs, albeit with projects largely at preliminary stages.

5.2.1.5. *Effect of restriction in using Remote Working Tools (RWTs) on Non-Medical Help support delivery*

Respondents' Use of Remote Working Tools (RWTs)

Of the 75.5% (71) reporting they used Remote Working Tools to deliver study skill tutorials, Microsoft's Skype was most named with 64.8% (46) respondents, followed by Apple's FaceTime, 9.9% (7 of 71), Google Hangouts by 4.2% (3); some used more than one, Table 20. Other RWTs were mentioned, eg GoTo Meeting[26] and Teamviewer[27]. Other tools were cited in support of tutorials although not necessarily used to deliver them, eg Google Docs[28], for sharing documents or collaboration tools such as GoConqr[29]. Frequency of use in tutorials was reported by 36 as between 1-9 times weekly, 2 respondents used an RWT 10 or more times weekly.

Skype's features were seen as particularly useful, comprising file transfer, screen (desktop) share, messaging within the application, cross-platform availability (Windows, IOS, Android), zero cost and availability to individuals.

Table 20: Remote Working Tools' use by respondents. n=71 multiple answers allowed			
Skype	**Other**	**FaceTime**	**Google Hangouts**
64.8% (46)	42.3% (30)	9.9% (7)	4.2% (3)

Respondents' Non-use of RWTs

Of the 23 who did not use an RWT to deliver study skills tutorials, 91.3% (21) gave reasons, Table 21. Personal, professional or student preference for only delivering tutorials in person was cited by 26.1% (6), absence of request by students by 21.7% (5) and the custom that all tutorials were delivered physically in-person was cited by 8.7% (2). Three respondents, 13.0% whilst not using the RWTs named in the study question, used a combination of phone and email support and 8.7% (2) respondents' roles did not involve giving study skills

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[26] https://www.gotomeeting.com/en-gb
[27] https://www.teamviewer.com/en/
[28] https://www.google.co.uk/docs/about/
[29] https://www.goconqr.com/

tutorials. Three respondents, 13.0% had plans to use an RWT, if allowed, and 4.3% (1) respondent's agency employer did not allow use of an RWT.

Table 21: Reasons for not using RWTs. n=23 multiple answers allowed						
Professional, personal, student preference	**Absence of student request**	**Use combination of phone and email**	**Role did not require it**	**In person tutorials are the custom**	**Other methods used**	**Usage not allowed**
26.1% (6)	21.7% (5)	13% (3)	8.7% (2)	8.7% (2)	8.7% (2)	1 (4.3%)

Choice of RWT

In choosing which RWT to use, 40 respondents identified four main reasons, Table 22. Half (20) cited their own familiarity with the tool, followed by their students' preference, 45.0% (18 of 40). RWTs' features also determined choice, 20% (8); 7.5% (3) stated the particular RWT was HEP recommended, Table 22.

Table 22: Reasons for using a particular RWT n=40 multiple answers allowed			
Respondent preference	**Student preference**	**Features**	**HEP recommendation**
50.0% (20)	45.% 18	20.0% (8)	7.5% (3)

Reasons for Delivering Tutorials via an RWT

Overview

Respondents reported a range of reasons for their students wanting to receive their Specialist Study Skills tutorials via an RWT, reflecting each student's unique set of circumstances. Respondents described their students as beneficiaries of the UK Government's WP in HE (OFFA, 2016) and:

1. With physical and mental health problems,
2. With young families or those with elder-care commitments,
3. Who live remotely from campus,
4. Working full or part-time to support themselves (and their families),
5. On low incomes who could not afford daily transport

Additionally, numerous respondents' students' courses incorporated placements remote from campus, study abroad and/or field visits. Respondents repeatedly identified the impact of interactions between the disability and personal/course circumstances in creating a set of complex problems which made it impossible for students to attend campus-based tutorials. Respondents also noted that Specialist Study Skills tutors (NMH support workers) were required to provide continuity of support, as identified within their professional guidelines (ADSHE, 2009, pp. 11, 12).

Respondents also mentioned that using an RWT was effective way of avoiding the sanctions[30] on a student when they cancelled their scheduled physical tutorials at short notice, an RWT-based session could be substituted for the physical one.

The rationale for using RWTs to deliver study skills tutorials is summarised in Table 23, respondents' detailed comments are shown in Appendix 10, S.16.

Table 23: General reasons for using RWTs n=71 multiple answers allowed							
Time, travel, employment	Placements, vacations	Student's comfort	Personal circumstance	Lifestyle, technology	Mental health	Physical health	Financial constraint
57.8% (41)	39.4% (28)	38.0% (27)	16.9% (12)	12.7% (9)	11.3 (8)	9.8% (7)	4.2% (3)

Drawbacks in using a Remote Working Tool

Of 73 responses, 63.0% (46) commented in narrative on drawbacks using RMTs, relating largely to the specific RWT technology, notably Skype, as it was the most frequently used, see above S5.2.1.5. Analysis showed that drawbacks related to technology issues and to delivering the study skills tutorial function. For example, technology issues were reported as internet/connectivity unreliability, unfamiliarity with the technology. Tutorial issues could relate to difficulties in demonstrating study strategies, being unable to pick up body-language cues.   Narrative responses are shown in Appendix 10, S.16.

Do physical tutorials in a room together always work?

For 32.6% (15 of 46) there were no circumstances in which physical tutorials did not work. A small number commented that their students had never requested a tutorial using an RWT, a further small number mentioned that when an RWT had been suggested students' preference had been for a physical tutorial. However, one respondent who replied "Never – it's better in my opinion [to have a physical tutorial]" conceded, "BUT (sic) when location/health condition is an issue then Skype is valuable alternative."

For 28.3% (13 of 46) their students' unexpected inability to travel to physical tutorials meant that on-campus meetings did not always work. As identified above, there is much that is unexpected in students' lives. Additionally, there were four mentions of students' timetabling and requests for tutoring at unsocial hours resulting in physical tutorials not working.

Students' need for support during placements and vacations was cited by 23.9% (11 of 46) as a reason for physical tutorials not working. Respondents reiterated post-graduate students' contractual need to continue academic work during vacations, when either they and/or their NMH support worker were absent from campus, or campus was closed.

Seven respondents mentioned that the meeting rooms and IT environment provided by their HEPs were not appropriate to delivering tutorials in a space which was free from

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[30] Two such cancellations could result in DSA support being withdrawn (DSA-QAG, 2016a, p. 10)

distractions and ensured confidentiality (DSA-QAG, 2016a, pp. 23, S2.4). Four respondents mentioned that during a physical tutorial, the proximity between tutor and student could lead to anxiety in some tutees leading to unsuccessful tutorials.

Comments on Disable Students' Allowances Quality Assurance Group's (DSA-QAG) guideline regarding the use of RWTs

Respondents were asked to comment, on Disable Students' Allowances Quality Assurance Group's (DSA-QAG) March 2016 guidelines stating that "Remote NMH support" [Remote Working Tools] could only be used to deliver tutorials if it had been specifically recommended by a Needs Assessor, Skype being specifically mentioned by DSA-QAG by way of example, (DSA-QAG, 2016a, p. 17).

Some 69 comments were received about the guideline, 62 negatives, 7 positives. Most respondents saw no positives and a small number could see both positives and negatives.

Comments favouring the guideline

Of favourable comments, 4.3% (3 of 69) felt the guideline would help ensure that students were not pushed into using an RWT. Additionally, 4.3% (3 of 69) stated that the process of referral back to Needs Assessors to request that an RWT be included in a [reissued] Needs Assessment Report, would work. A further 2.9% (2 of 69) stated that the need explicitly to recommend an RWT would ensure that the position of physical tutorials would be enhanced.

Comments against the guideline

Loss of flexibility and associated inability to deliver student-centred support were the primary negative factors reported in 39.1% (27 of 69) comments. Additionally, a further 13.0% (9 of 69) observed that the guideline took no account students' real lives in which 'things happen' unexpectedly and that, "Needs Assessors are not clairvoyant." A further 10.1% (7 of 69) expressed worry that Needs Assessors would require, but might not possess, detailed knowledge of students' courses to cater even for predictable absences from campus due to placements, study abroad and field work. Comments acknowledged that Needs Assessors discuss course requirements with students during Needs Assessments, however 8.7% (6 of 69) were concerned that some students, particularly those with SpLDs who may have difficulty in memorising such matters, would be unable to inform Needs Assessors of such detail. A lack of knowledge in both student and Needs Assessor of the potential benefits of using an RWT also caused concern.

The perception that the guideline removed student choice was referred to in 7.2% (5 of 69) comments and a further 2.9% (2 of 69) suggested that the choice should not be binary between Skype or physical tutorials but a blended approach to suit the student, allowing for discretion between the student and their professionally qualified NMH support worker.

The guideline was seen in 8.7% (6 of 69) of comments as potentially forcing a break in support for students in need, further increasing possible anxiety already caused by their absence from campus and in-person support. Additionally, comments revealed concern regarding the additional workload and costs on Needs Assessors when they [Needs Assessors] were asked to revise a Needs Assessment Report written some years before, Table 24.

Table 24: Comments about the guideline n= 69, of which 62 negative comments, the latter shown in this table n=62						
Flexibility lost	**Real life cannot be predicted**	**NAs may not possess sufficient course knowledge**	**Students may not possess sufficient course knowledge**	**Student choice removed**	**Choice should not be binary but blended**	**Forces a break in support**
43.6% (27)	14.5% (9)	11.3% (7)	9.7% (6)	8.1% (5)	3.2% (2)	9.7% (6)

In summary, respondents were:

1. Surprised that there had apparently been neither communication nor consultation with practitioners prior to the guideline's issue,
2. Bewildered by the guideline's logic, believing that the choice of delivery should lie in a decision between student and NMH support worker, based on student need at the time and their support worker's professional judgement. The prohibition seemed arbitrary,
3. Concerned that Needs Assessors might not have the knowledge of how RWTs could benefit students in general or specifically given the nature of an individual student's course requirements, nor possess clairvoyance to see unpredictable future needs, nor have the time nor budget to reissue Needs Assessment reports long after their original issue.
4. Believed that BIS's stance was retrograde and contradicted its own encouragement of the sector to develop more inclusive learning environments.

5.2.1.6.   *Discussion – Remote Working Tools*

This part of the study demonstrated that many respondents' students gained significant benefits from receiving some or all their study skills tutorials using RWTs. Conversely, a small number of respondents felt that RWTs did not suit all students, they might exacerbate a disability, make more difficult the delivery of multisensory tutorials or hinder rapport development. A number felt that a decision to use an RWT should be the student's alone and not their NMH support worker's preference. The guideline that remote NMH support tutorials could only be delivered if explicitly recommended by a Needs Assessor was thought misguided.

Higher Education Statistics Agency (HESA) statistics for AY2015/16 showed that fully 34.9% of UK undergraduate students enrolling at English HEPs followed either sandwich or part-time studies (HESA, 2017). This meant their absence from campus during term times would

be certain and attending physical, face-to-face, tutorials would be impossible eg nursing, see *Supporting dyslexic students on practice placements* (University of Southampton, 2015). Comparable figures for AY2013/14 showed 30% following sandwich or part time studies (HESA, 2015) and for AY2014/15 some 33.9% (HESA, 2016b).

Hence, the trend in WP, courses requiring multiple campus absences, the unpredictable nature of students' lives interacting with their disabilities and the requirement to deliver to different Equity Groups' needs rendered obsolete the 'one size fits all' idea of just providing on-campus support, in physical, face-to-face tutorials. This ill-thought through policy, without basis in evidence and seemingly defying any sense of understanding of the reality of contemporary HE studies effectively discriminated against numerous of the students DSA was supposed to support. The issue was exacerbated by there being no consultation prior to the rule's introduction and no recognised 'appeal' procedure in place. This research's concluding section, S.6.3, in its recommendation of an Institute for Inclusive Teaching and Learning seeks to avoid such misguided policy in future by appointing knowledgeable practitioners to its management.

Within 6 months from the guideline's issue the Department for Education (DfE) conceded, "We recognise that on occasion the student may wish to receive their support remotely, eg if they are on a field trip abroad, or not able to attend the usual place of delivery for a particular session" (DfE, 2016). In the context of this Study's respondents, and their students, that *volte face* was a welcome step. Nevertheless, it appeared to underestimate the actual variability in many students' lives as evidenced in general by the volume of comments presented in this research, but particularly the existence of placements, the need to continue academic work during vacations and whilst studying abroad, a 'far cry' from DfE's conception of 'on occasion'.

Notwithstanding, in the subsequent, November 2016, revision of the NMH Quality Assurance Framework (QAF), V1.3, §2.4, the restriction on using RWTs was still stated, without the concession for 'occasional' use (DSA-QAG, 2016c). The restriction was only formally communicated and RWT use "to be by mutual (student and support worker) consent" in the May 2017, V1.5, revision of the QAF (DSA-QAG, 2017b).

DfE's *volte* face, was complete when in 2020, RWT's were endorsed by SLC as the means to deliver NMH support tutorials during the Corona Virus Disease-2019 (COVID-19) lockdown where " it is appropriate to do so sessions can continue to be provided remotely" (SFE, 2020). In a major report, six professional associations[31] participated in a survey of disabled

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[31] PATOSS (Professional Association of Teachers Of Students with Specific learning difficulties), ADSHE (Association of Dyslexia Specialists in Higher Education), NADP (National Association of Disability Practitioners), UMHAN (University Mental Health Advisors Network) and BATA (British Assistive Technology Association), ANMHP (Association of NMH Providers).

students and NMH providers looking at the effects, *inter alia*, of NMH support moving online during the lockdown using RWTs (3,614 student respondents, 126 NMH providers) (Association of NMH Providers, 2020). The report endorsed this research's findings regarding the flexibility, capability, and overall utility together with the drawbacks of using RWTs for support delivery when campus presence was impossible.

5.2.2. Overall discussion, whole study

The Study's two parts showed that the DSA support environment was already changing in the months prior to full implementation in AY2016/17, the main effects were:

1. Loss of employment at HEPs as disabilities support departments were downsized or closed,
2. Loss of employment by independent suppliers as their referrals dried up,
3. Independent suppliers and HEPs' former staff registered with agencies to maintain income,
4. Agencies gained work,
5. Increased bureaucratic volume, rigidity and complexity,
6. Compromised ability of NMH support workers [Specialist Study Skills tutors] to deliver to the needs of their disabled students by a restriction on using RWTs to deliver tutorials,
7. To encourage HEPs to examine the idea of becoming more inclusive institutions and launch initiatives to further that aim.

This list of consequences, at least when viewed from practitioners' standpoint, begs a question regarding the extent to which BIS had anticipated such effects. An answer might lie in the quick *volte face* to relax the restriction on using RWTs which suggests that insufficient thought had preceded the changes in general and that change in particular; or that other benefits outweighed the negative consequences. Were these other benefits to have existed they were never effectively communicated to NMH support practitioners nor indeed students.

5.3. Study 3: Challenges of implementing Inclusive Learning Environments at HEPs

5.3.1. Study summary

The findings of Study 1, *The Nature of an ILE*, prompted a further question, "What was it like to implement an ILE?" leading directly to this longitudinal, qualitative, semi-structured telephone interview study (n=8) of respondents working at different HEPs, both pre and post-1992. Their job role, if not title, was *inclusivity officer*, they managed or were deeply involved with inclusivity-related projects. Respondents' reported variously into Disability Services, Learning Development, Registrar, Information Services, Library and Student Services. Time in-post varied between 5-24 months when first interviewed.

Study objectives were to:
1. Hear about project successes and frustrations,
2. Understand what had and had not worked for them,
3. Learn how they would change their roles to become more effective.

As respondents' academic year progressed events gave rise to sense of satisfaction and/or futility. Hence, a further study goal emerged, to investigate whether respondents' work was either 'Sisyphean', hard and ultimately futile (Encyclopaedia Britannica, n.d.), or Herculean', comprising many tasks, requiring strength and determination, but ultimately successful (Encyclopaedia Britannica, n.d.).

5.3.2.   Support for Inclusivity Across the Organisation

Respondents stated that support from colleagues, specifically senior management, academics and support departments was vital in determining their inclusion projects' success; Figure 22 shows the level of support respondents felt they received and the key issue(s) they identified with each group.

Half felt they received good support from senior management, whilst three thought senior management support poor. Respondents discussed senior management stability and how its absence caused their own HEP's inclusivity agenda to "fall by the wayside". Seven respondents questioned senior managements' real commitment to the agenda; one mentioned "lip-service" being paid to the inclusivity agenda by including it as an objective in a curriculum redesign but without then staffing the project with experience of delivering greater inclusivity. The TEF's lack of explicit measures of inclusivity was seen as encouraging senior management's lukewarm embrace of inclusivity, see Leverage below. One respondent, however, enjoyed significant support, meeting the Vice-Chancellor eight times annually.

Respondents were pleasantly surprised by support from academics, having expected pushback, commenting that there would always be variable levels of support, based on individual belief and character. Seven respondents mentioned that success was contagious; one academic's successful project snowballing into further requests for projects; academics with successful projects became inclusivity exemplars. However, providing support for academics to create inclusive materials and change their teaching was a crucial success factor. Again, the TEF's lack of explicit measurement was cited as a reason for academics not focussing on inclusivity, see Leverage below. Multiple campuses also caused issues; physical separation seemingly slowed progress.

Common themes emerged regarding support departments (non-academic departments, such as Registry), where broadly, support for the inclusivity agenda was less forthcoming. Respondents found rigid organisational silos impeding, sometimes blocking, cross-functional working. One respondent noted despairingly, "Support staff barely talk to one another, or academics. Management have created functional silos." Conversely, one respondent had

addressed silo mentality by forming a working party which crossed, but did not seek to change, functional boundaries. Another reported trades unions as supporters. Respondents also found demarcation issues, in one case, a department refused cooperation to avoid its members being de-skilled by increased embedded inclusive teaching.

Figure 22: Support for inclusivity across organisations
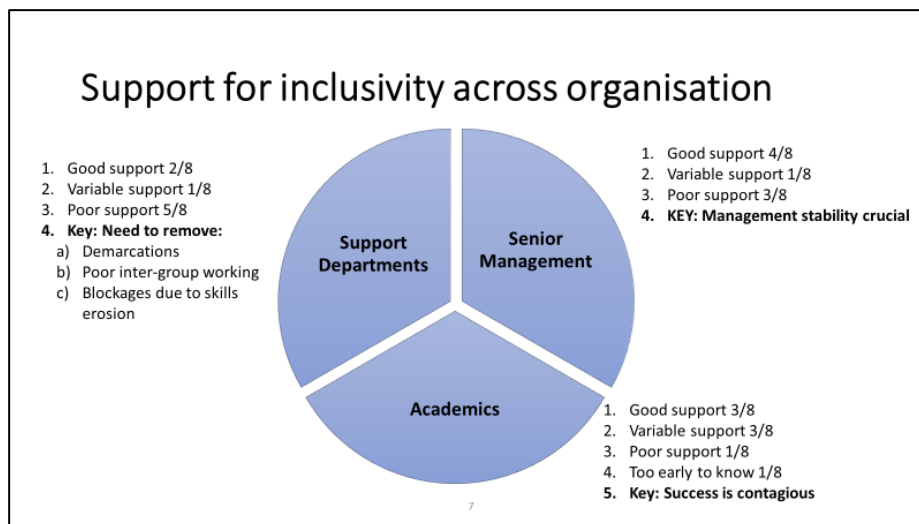
5.3.2.1. Strategies which worked

Respondents identified three successful strategies: effective internal networking, having champions and using levers to influence policy.

Networking

Networking was a process of give and take. Respondents attended many internal meetings held to communicate departmental work to others and found that reciprocating with their own inclusivity orientated meetings achieved engagement. Respondents felt that they needed to become known as the 'go-to' person regarding inclusivity. Respondents found that 'How can we ….' meetings, addressing issues as common problems, solved by communal action, worked best. Working to colleagues' agendas worked better than working to respondents' agendas. Attendance at other HEPs' and industry events were seen as important, accessing ideas, sharing problems and solutions which had worked elsewhere.

Champions

The role of champions was important to drive success. However, the word champion was itself slightly problematical, it connoted a spectrum of meaning from expert practitioner to promoter or advocate, to someone whose connections could deliver a successful project – a 'fixer'. Howsoever defined, champions encouraged a sequence of small victories, which accumulated to wider success. Success was contagious. Non-financial rewards worked well as incentives for champions, eg conferring awards on individuals or post-nominal letters. One respondent reported that academics were encouraged to submit their projects for

external awards, with one winning a prestigious international award despite the HEP being reluctant to embrace the project.

Leverage

Leverage, "something used to achieve a desired result" (Merriam-Webster, n.d.), was reported operating in three ways: personal, within-institution and from outside the HEP. Personal leverage operated with the question, "If he/she she can achieve that, then why not me?", through tapping into individuals' competitiveness, or sense of potential loss. An HEP's poor score in the National Student Survey (NSS) (HEFCE, 2016b) was also a change lever. Although the inaugural Teaching Excellence Framework (TEF) results had not yet been published (THE, 2017) respondents commented that it lacked explicit measures for inclusivity therefore detracting from efforts to improve inclusivity. However, TEF guidance stated that quantitative data-based metrics [none of which measured inclusivity] could be supplemented by written statements "in respect of each of…teaching quality, learning environment, and student outcomes and learning gain […] so additional evidence in the submission is particularly important where the metrics do not provide clear cut indicators of performance…" (DfE, 2017a, p. 50). One respondent, whose follow-up interview occurred after the 2017 TEF results announcement attributed his institution's elevated status in the awards to its written submission's inclusivity statements counterbalancing its data-based metrics. Three respondents mentioned the Athena Senior Women's Academic Network (SWAN) initiative for encouraging female participation in Science Technology, Engineering, Mathematics, Medicines (STEMM) subjects as a model for promoting inclusivity beyond gender (Advance HE, n.d.c) and were keen to use their institution's lessons in promoting gender equality and receiving or working towards Athena SWAN awards in a wider inclusivity context.

5.3.2.2.   *Strategies which did not work*

Respondents were clear about strategies which gave poor results, or engendered hostility.

Newsletters

"Impersonal", "waste of time [and] valuable resources", "expensive" were three descriptions used to describe newsletters, recipients regarded them as advertising, in one case "propaganda". One HEP, emailed a newsletter to 500 internal addressees yielding just 20 opens and minimal click-throughs. One respondent's colleague said, referring to a newsletter's 'inclusivity story', "Well it might work for history, but it wouldn't work for geology." Respondents also noted that solutions which appeared generic were rejected.

Lecturing

'Lecturing' in the context of implementing an inclusive learning environment referred to respondents telling colleagues what they *must* do. Respondents noted that lecturing senior management had not yielded results, although fewer than half met senior management.

Lecturing academics on their legal duties or compliance to Government WP policy also failed. Many academics felt respondents lacked any credentials in their [the academics'] subject area and hence were sceptical when offered advice, especially if delivered with any hint of compulsion, that they "had to" make changes to their teaching. Finally, respondents mentioned that their colleagues in support functions were protective of the *status quo.*

Inadequate Consultation

The Royal Navy adage that "one volunteer was worth two pressed men" (Knowles (ed), 1999, p. 609:6) was reflected amongst academics. Most respondents found that attempts to gain colleagues' participation without consultation failed. For example, academics at one HEP rebelled against a lecture capture system, implemented over a vacation, which they were 'mandated' to use the following term. Subsequent participation rates were low.

Respondents also noted that HEPs worked to planning cycles and that inclusivity projects needed to recognise these and work within their constraints to yield success however long-winded that might seem.

All respondents referred to the students' voice and its importance in identifying, planning and implementing successful inclusivity projects.   A number referred to the slogan "no about us without us", which was adopted by the US disabilities rights movement in the 1990s (Levinsky-Raskin & Stevens, 2016); (Charlton, 2000), as a mantra when implementing inclusivity projects. However, respondents reported differing degrees of student participation and data availability but only one complained that too much data led to "analysis paralysis". The National Students Survey's (NSS) data was too coarse grained for to be useful regarding discreet inclusivity projects, typically being too small to affect institution-wide outcomes, the level at which the NSS worked (NUS, 2017a). Additionally, the NSS did not contain explicit questions regarding inclusivity.

5.3.2.3.   Wish List

Respondents' wish lists related to their HEPs and roles. At the institution level, all agreed that whilst statements about inclusivity were useful, demonstrable management commitment was more so, eg as an agenda item at quarterly Executive Committee meetings. Such lack of commitment was reflected in none of their institutions having adopted, formally or informally, a definition of either inclusivity, inclusive teaching or inclusive learning. None possessed measurement criteria, thus making problematical the assessment of progress towards inclusivity goals, leading to additional items on respondents' wish lists, that there should be measurable HEP and personal inclusivity goals.

All valued working cross-functionally, hence reducing silos and demarcations at their HEP were further wishes. Respondents acknowledged that silos would always exist and wished for more cross-functional working parties as "the way forward…we're all part of the problem, so we all need to be a part of the solution" according to one. Some of the respondents reported through a learning development organisation, others through a

disabilities or student services structure. All respondents felt that credibility with academics depended on avoiding being "pigeon-holed as a member of the disabilities team", those in that position wished to be within or closely working with the learning development team which they believed would prove more effective.

5.3.3. The Longitudinal View

As the academic year closed follow-up interviews were held to investigate respondents' out-turn. Interviews were again conducted by phone and recorded, informed consent sought and given. A transcript of their first interview was given and they were asked, simply, "What happened next?" The narrative below contains their answers with anonymised name changes.

5.3.3.1. Respondent Adrian: "Small steps rather than giant leaps, which terrify people"

Adrian's year was effective and Herculean.

He reported that:

1. He built personal relationships with academics, establishing 'inclusivity contact' with 80% of academic departments through personal meetings where he "…found that by hearing staff's concerns, engaging in that one-to-one discussion…[meant] staff have responded very positively…",

2. He delivered departmental workshops, raising awareness and identifying practical responses to challenges highlighted by staff and/or students regarding inclusivity. These workshops allowed "staff to identify the project work that we…develop[ed] over the course of the year",

3. He initiated small, achievable projects which academics identified as solving problems and which they, therefore, supported,

4. His title was widened beyond student disability support to include inclusivity, this change facilitated closer working with the teaching and learning development team,

5. He managed a successful inclusivity pilot regarding an area of student dissatisfaction with assessment feedback and planned further roll-out in AY2017/18,

6. He secured funding to develop an inclusivity toolkit pilot based on staff and student input,

7. He held workshops investigating student feedback so that suggestions for change were not seen to come from him, the 'expert', who might know little about the academic subject, but were seen to "possess credibility in coming directly from students",

8. He ran 'going beyond the label [of a particular disability or characteristic]' workshops helping academics understand patterns of difficulties, allowing them to adapt their teaching to the heterogeneity of Equity Groups' needs as an alternative to labelling

individuals' disabilities. He used these workshops to deconstruct the unpopular language of inclusivity into academics' context.

5.3.3.2.   *Respondent David: Deeply frustrated by funding cuts*

David's year which started as one of progress, progressing multiple tasks, ultimately proved Sisyphean.

David reported initial success with his strategy at various management committees. Additionally, other projects were progressing:

1. Proposals were accepted for conducting inclusivity audits in eight of the HEP's schools,
2. He gave workshops to academics to raise inclusivity awareness,
3. He created an alternative assessment strategy working with the teaching and learning development team,
4. He presented to faculty education committees, forging links with academics with a view to identifying curriculum projects for enhancement projects.

In progressing these initiatives, he found that the HEA framework for inclusion was neither sufficiently "concrete" nor "robust" to form the basis for conducting an inclusivity audit, similarly that UDL was unsuitable.

However, problems arose:

1. The HEP changed the way it delivered study skills support, moving it from the disabilities support team into faculties to be available to all students. This change was based on NSS feedback about weakness in students' study skills' knowledge. The change reduced the HEP's appetite for improving inclusivity through its teaching and learning development team,
2. Technological change, from one Learning Management System to another, required significant investment in time and resource,
3. The Disabled Students' Sector Leadership Group (DSSLG) report, aimed at HEP Vice-Chancellors and executive boards, had had no impact, indeed, was neither talked about nor circulated (DSSLG, 2017),
4. In mid-academic year funding for David's projects was withdrawn, all inclusivity-related projects stopped and were not restarted.

5.3.3.3.   *Respondent Marsha: The year of the "champion"*

Marsha enjoyed considerable Herculean success, with a supportive HEP, although some minor problems were encountered.

1. The HEP had embraced the role of "inclusivity champion", embedding it within faculties,
2. The HEP was taking a mixed approach of implementation by faculties/departments whilst maintaining central direction and focus through an institutional strategy. Eg

the Athena SWAN initiative was centrally mandated but delivered through over 30 faculties/departments and their champions,

3. Inclusivity activities were guided from within a single working group and were focused on gaining institution-wide Athena SWAN accreditation,
4. The HEP's Athena SWAN activities lay within a "mission and equality vision", Marsha's team were working on a framework to enable implementation during the following academic year,
5. Equality champions and staff/student-led forums continued to run,
6. The equality champion role was acknowledged as time-consuming however, workload alleviation was under investigation

However, some problems of differing perspectives and priorities existed. For example, there was a mismatch between the objectives of a working group, comprising mainly disability practitioners, drafting policies and those of the approving committee, whose inclusivity perspective was much wider, which led to an impasse.

5.3.3.4.   *Respondent Angela: A mixed year, some progress but frustration with absent management commitment*

Angela had a mixed year part Herculean, part Sisyphean.

Positives included:
1. An HEP-wide curriculum review had started, encompassing design, delivery and assessment,
2. An initiative commenced to lessen emphasis on a single summative summer exam, replacing it by two end-of semester exams and continuous assessment,
3. A Certificate in Academic Practice had been introduced as induction training for new academics plus workshops for existing academics now included inclusivity modules. Some 64 received training during the year, but with 1,000 academics full delivery would be protracted.

Negatives included:
1. A frustrating paradox, some colleagues saw that incorporating inclusivity for disabled students into the curriculum review and the subsequent curriculum modification would slow down the whole review and change process, despite the requirement to address disabled students' needs being a project objective,
2. Funding for a UDL post was refused. Hence there was no UDL expertise on the curriculum redesign team, weakening senior management's understanding of and commitment to operationalising inclusivity,
3. Lack of resource for the disability support service which was expected to be entirely operational in supporting students as well as acting as a contributor to the inclusivity project but with no increased headcount. This approach limited Angela and support colleagues from providing sufficient impetus to the wider initiatives.

The lack of acknowledgement of resource needs by senior management led Angela to question its real commitment to inclusivity, thus the potential for Sisyphean futility existed.

5.3.3.5.   Respondent Corrine: Significant progress

Corrine's year was Herculean, aided by good institutional backing. However, she still had to overcome the range of academics' responses from active engagement, through denial of responsibility, to refusal to acknowledge the issue, "I spoke to a Head of Department, who said 'Well it's not broke so why change it?'"

Positive progress was made:
1. Corrine's learning and development team role received an additional year's funding,
2. She had promoted the inclusivity agenda extensively through numerous cross-faculty awareness-raising workshops and working with individual academics plus student groups. The student interaction provided insight for the academics into different Equity Groups' needs,
3. Inclusivity was now included in the HEP's Certificate in Academic Practice and Continuing Professional Development (CPD) programmes,
4. Corrine developed an approach to answer colleagues' request to 'Tell me specifically what I can do within my lecture' by answering in the academics' own context; generic answers were quickly dismissed,

Mid-year her HEP created an 'academy', modelled on the Higher Education Academy (HEA), promoting inclusivity institution-wide, allowing academics to gain 'academy' recognition, plus funding and support for their curriculum initiatives.

Additionally, over a 2-year implementation, all curricula would need approval for delivering inclusivity, including significant student feedback. Each faculty would develop its own inclusive practice, helping academics overcome feelings of isolation and overloading which many currently felt when faced with becoming more inclusive.

5.3.3.6.   Respondent Harry: Significant progress once management changes stopped

Harry's original interview revealed a Sisyphean feeling of futility, which through the year gave way to one nearer Herculean achievement and forward direction, albeit with severe reservations about inclusivity for disabled students.

Success were:
1. Management changes ceased,
2. "People [were] no longer fearful for their jobs",
3. Harry's own reporting changed, providing higher level access,
4. Harry assumed greater responsibility, becoming an Equality & Diversity Inclusion (EDI) Champion within one of the HEP's schools,

5. With his HEP focused on gaining both Equality Challenge Unit (ECU) Race Equality (Equality Challenge Unit, n.d.) and Athena SWAN Charter Marks;. Harry was involved with reporting success in creating action plans, seeking approval for and commitment to drive them through and being "recognised as the Equality and Diversity Initiative person".

However, on the negative side Harry expressed grave worries about inclusion for disabled students:

1. Disabilities and curriculum were never discussed together,
2. The responsibility to respond to disabled students' needs was removed from academics and placed wholly into the disabilities service. Responding to those with disabilities "continued to be a 'bolt-on' activity",
3. Integrating inclusion into the HEP's activities was not being considered for disabilities,
4. Within the teaching and learning development function there was "little idea about what a curriculum design should look like for inclusivity",
5. The HEP had no definition for inclusivity in an academic sense, and with neither the Research Excellence Framework (REF) (HEFCE, 2017c) nor the TEF (HEFCE, 2017d) including any inclusivity metrics, there would be little progress.

5.3.3.7. *Respondent Sandra: Enough momentum to avoid the paralysis of senior management change*

Despite management turmoil and frustration with academic colleagues, Sandra moved forward with a major Herculean task due to momentum she had already created.

Sandra reported effective progress until a midyear HEP-wide organisational change. Subsequently, "the university executive board only [had] one item on the agenda…the organisational change". Strategic decisions about inclusivity were postponed.

However, Sandra had already:

1. Engaged in inclusivity profile raising activities which had created a momentum,
2. Ensured a place in the annual learning and teaching symposium's agenda for inclusivity,
3. Gained one-year project funding to create an inclusive course design checklist bringing together expertise, ideas and experience from "academics from various subject areas and support staff so there are education specialists, IT specialists, and we'll also have representation from the student union, student course reps",
4. Inclusion of alternative assessment formats in the course design checklist,
5. Achieved effective progress with one of the HEP's five faculties, whose Director of Learning & Teaching acted as sponsor for various initiatives.

On the negative side Sandra had:
1. Never been invited to attend meetings of the sponsoring Faculty's Teaching or Student Experience Committees and so questioned the Faculty senior management's "real" commitment to inclusivity,
2. Found that DSSLG report *Inclusive Teaching and Learning in Higher Education as a Route to Excellence* (DSSLG, 2017) ineffective with academics, whose reply was frequently, "Oh well, we already do some of these things anyway." Sandra disagreed, "academics largely do not themselves teach inclusively, [the HEP] still runs a deficit model" with support separated from the teaching function; Sandra was frustrated by this model.

5.3.3.8. *Respondent Stephen: Successful engagement with academics but wary about HEP's future direction*

Stephen achieved numerous Herculean goals but was worried about the 'domestic' inclusivity task being lost if his HEP proceeded with international expansion making some of his efforts somewhat Sisyphean.

Stephen's successes included:
1. "Outreaching" to both support staff and academics on a personal basis, which although taking "slightly longer…[gave] a more robust outcome",
2. Holding workshops to encourage participants to talk about their experience of inclusive practice,
3. Moving from a planning and research role into "actually doing stuff and being a bit reflective on what we've achieved so far",
4. Running pilots eg based around transition into the HEP, see also Kift (Kift, 2009), delivering mutual support through disabled students' buddy schemes,
5. Using "…three or four academics [early adopters] actually engaged with looking at how they deliver and how it can be improved in terms of inclusion through the Universal Design for Learning framework",
6. In response to Universal design for Learning "not [being] the holy grail…[and]…academics not [liking] its language", Stephen reported working with colleagues to write a UDL handbook "that's contextualised to our particular university",
7. Preparing the ground for using "video clips embedded within [the Universal Design for Learning handbook] to demonstrate our own teaching staff delivering in that way,"
8. Working with academics to examine standards by which to measure their own competency levels in delivering inclusivity, despite there being no, HEP-wide definition of "inclusivity".

Negative aspects of his year were:
1. Senior management changes caused lost momentum as it was more difficult to get decisions,
2. The HEP was apparently looking to expand internationally in the face of static or falling home student applications. This refocus meant that decisions about disability inclusion were postponed.

5.3.4.   Conclusion

The investigation sought to understand experiences when managing inclusivity-related projects in eight HEPs over one academic year. Although not representative of the sector due to its small, convenience sample nature, respondents' inclusivity stories illustrated:
1. The importance of management and organisational stability,
2. Sector-wide reports did not materially affect individual HEP's actions,
3. The need for motivated, persuasive individuals 'on the ground' helping colleagues change their behaviours,
4. Champions made important contributions in leading initiatives,
5. That effecting change was hard and frustrating; even within the course of one academic year frustration can turn to success and *vice versa,*
6. Achieving change required many contributory actions,
7. Cooperation and consent at both individual and institutional levels worked better than coercion,
8. Formal and informal training were needed and should include Equity Groups' needs,
9. Definitions of the terms 'inclusivity', 'inclusive teaching and learning' when not institutionally adopted did not stop progress with aspects of delivery of inclusive practices,
10. Widening the scope of 'inclusivity' might have disadvantage disabled students,
11. Achieving institution-wide inclusivity required much time, energy, resources and patience.

This Study's findings, despite its small size, demonstrated significant correlation (in all but 2 of 17 categories) with its precursor, Study 1, *Understanding the Nature of an ILE*, above. Table 12 shows the nine themes of ILEs and eight barriers identified in Study 1 and where this *Inclusivity Officers* study identified the same characteristics, Table 25.

Table 25: Comparison of themes of and barriers to ILEs (Study 1) and *Inclusivity Officers'* findings (Study 3)	
Nine themes of nature of ILE (Study 1)	**Inclusivity officers reported as including (Study 3)**
Philosophy or mission	Y
Management	Y
Technology	Y
Assessment design	Y
Design of course specific materials	Y
Design of non-course specific services	N

Academic staff awareness, training and attitude	Y
Wellbeing support environment	N
The built environment	Y
Eight barriers to implementing ILEs (Study 1)	**Inclusivity officers reported as including (Study 3)**
Need for and extent of training	Y
Academic staff attitude	Y
Financial resources,	Y
Time availability	Y
Need to work cross-functionally/use all internal resources	Y
Need for leadership	Y
Challenge of creating inclusive courses	Y
Facilities constraints	Y

This study also identified the importance of WI approaches, as repeatedly emphasised in the Australian FYE initiative (Nelson & Kift, 2005); (Kift, 2009); (Kift, 2015). However, Williams et al. (Williams, et al., 2019) found that only 19.7% of English HEPs (n=66) thought that a definition of inclusive practice should include a "collaborative approach", implicit within WI.

In summary, 'inclusivity officers' apparently face many more challenging tasks than Hercules' mere twelve, requiring them to be determinedly resilient and possess a sense of mission to see the job done but still needing stable executive management and backing.

5.4.   Study 4: One year in – effects of changes on NMH providers

Note: Familiarity with Appendix 3, S.9, *How NMH Work is Awarded* will aid this section's understanding.

This Study 4 is a longitudinal complement to Study 2, which established the *Baseline of effects of early changes on NMH providers,* and assesses the Modernisation's effects towards the end of its first operational year, AY2016/17.

5.4.1.   Responses

5.4.1.1.   Quantitative Responses

1.   Completed responses to this semi-structured online survey totalled 262, respondents' students studied at 184 HEPs/Further Education Colleges (FECs)[32] (177 England, 7 Wales). This Study's respondents represented 44.5% of NMH providers and 8.7% of NMH support workers compared to DSA-QAG's 589 authorised NMH providers, with whom in 2017 were registered 3,020 support workers (DSA-QAG, 2018a). Table 26 and Figure 23 show the geographical spread of where respondents delivered NMH support, which could cross-regions, in both tabular and chart format, respectively. This demographic data demonstrates the sample represented all geographic parts of English HE.

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[32] Some FECs also offered HE courses which made their students eligible for DSA, which if awarded would likely result in NMH support being offered, delivered by some of this Study's respondents.

Table 26: Geographical spread of respondents' NMH practices n=262 multiple answers allowed					
Region	**% (number)**	**Region**	**% (number)**	**Region**	**% (number)**
SE England	23.7% (62)	W Midlands	13.4% (35)	Scotland	2.1% (3)
London	21.4% (56)	E Midlands	12.6% (33)	Wales	5.0% (13)
SW England	14.9% (39)	NE England	9.9% (26)	Outside UK	0.4% (1)
NW England	14.1% (37)	E England	7.6% (20)		

Figure 23: Geographical spread of respondents' NMH practices. n=262 multiple answers allowed
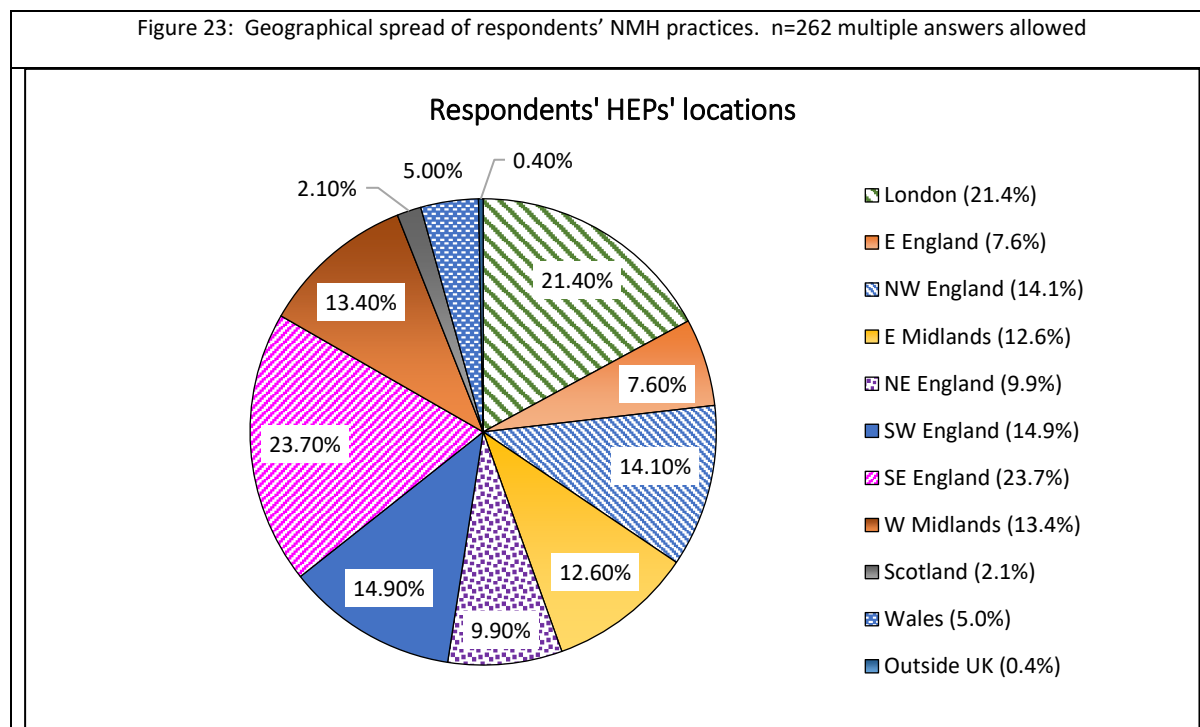
2. Respondents' practices' profiles, Table 27, shows 55.7% (146) worked (employed status) for HEPs/FECs, 44.3% (116) were independent of institution. Some independent respondents worked in multiple capacities; 52.6% (61 of 116) worked on their own, 12.1% (14 of 116) employed other NMH practitioners, 44.8% (52 of 116) worked for one or more agencies and 21.6% (25 of 116) worked as contractors to HEPs/FECs. The profiles indicated that respondents broadly represented possible roles. Note, in this Study, respondents delivered support at both HEPs and FECs, however, the Modernisation applied equally to HE students studying at either type of organisation.

Table 27: Respondents' practices' profiles. n=262					
Primary status		Profile of the independent NMH providers n=116 multiple answers allowed			
Worked directly for HEPs or FECs	**Worked independently of HEPs or FECs**	**Independents working on own**	**Independents employing other NMH practitioners**	**Independents working for one or more agencies**	**Independents as a contractor to HEPs/FECs**
55.7% (146)	44.3% (116)	52.6% (61)	12.1% (14)	44.8% (52)	21.6% (25)

3. For the 116 independents, that is, not employed by HEPs, comparing student referrals for AY2016/17 to prior years, just over half 51.7% (60) experienced either some fewer

or many fewer students. Contrastingly, 16.3% (19) experienced many or some more student referrals; just under a third 31.9% (37) experienced no change, Table 28. As these independent NMH providers could and did work for multiple HEPs, the data did not have the granularity to identify differences in the situation between different HEP type, ie pre- and post-1992.

Table 28: Comparison of number of student referrals experienced by independent NMH providers in AY2016/17 to prior year. n=116				
Many more students	**Some more students**	**Same number of students**	**Some fewer students**	**Many fewer students**
6% (7)	10.3% (12)	31.9% (37)	18.1% (21)	33.6% (39)

4. To understand better these independent NMH providers' experience, narrative responses were invited, "Please describe the effect of the new referral system on your NMH practice", 116 were received (multiple answers allowed), Table 29. Their top concern was loss of business due to the new referral system, cited by 38.8% (45); 24.1% (28) described receiving no referrals and the financial implications thereof, being forced register with agencies to ensure work despite a considerable drop in hourly rate, 12.1% (14). New paperwork processes were more time consuming, 19.8% (23); 11.2% (13) said they were leaving the profession due to fewer referrals or their qualifications were now insufficient to continue. Some, however, experienced little business change, 11.2% (13). Other worries included feeling less able to deliver a quality service, 6.9% (8), their HEPs/FECs were either downsizing or eliminating in-house NMH support delivery, 3.4% (4). Lack of access to confidential meeting spaces meant that tutorials occurred in open spaces 2.6% (3), overall, the work was more stressful, 1.7% (2) and poor communications about the changes, 1.7% (2).

Table 29: Number of student referrals - themes identified in narrative responses in response to question: "Please describe the effect of the new referral system on your NMH practice." n=116 multiple responses allowed										
Ineffective referral system/no referrals	**Financial downside**	**Complex, time consuming process**	**I'm now with agencies**	**Leaving profession/ new requirements have disqualified me or my staff**	**Little change**	**Less able to provide quality service**	**HEP/FEC org problems and/or in-house shutdown**	**Must meet in open spaces**	**More stressful**	**Poor comms about the process**
38.8% (45)	24.1% (28)	19.8% (23)	12.1% (14)	11.2% (13)	11.2% (13)	6.9% (8)	3.4% (4)	2.6% (3)	1.7% (2)	1.7% (2)

5. The study wanted to understand how independent NMH providers' relationship with HEPs/FECs might have changed, asking the narrative question, "How, if at all, has your relationship changed with the HEPs/FECs where deliver your NMH support?" Some 105 responses were received, none of which were positive, Table 30.

Table 30: Themes identified in narrative response to question: "How, if at all, has your relationship changed with the HEPs/FECs where deliver your NMH support?" n=105						
Relationship more distant	Changes in employment status or pay	More paperwork/ cost / time	I am no longer valued as a professional	Students suffering	Unavailability of confidential tutorial space	There are anti-competitive/ conflict of interest
31.7% (39)	22.9% (24)	12.4% (13)	9.5% (10)	7.6% (8)	4.8% (5)	3.8% (4)

Prior to the Modernisation, NMH support workers generally had close and typically longstanding relationships with HEPs/FECs, they were either employed by them or subcontractors to them. The Modernisation, by introducing the idea that any NMH provider could be referred to deliver support to HEPs'/FECs' students, changed the relationship's nature, see Appendix 4, S.10. Where the NMH provider remained the HEP/FEC, the change might only relate to the increased paperwork associated with the changes. However, where the NMH provider was a 3rd party, the responses revealed major change, Table 30.

Primarily, these independent respondents felt the relationship was more distant, 31.7% (39), eg they could not discuss student-related issues directly with the institution but had to go via their agencies, which held the contractual supply relationship with SLC/Student Finance England (SFE). Changes to employment, through lay-offs, outsourcing, pay reduction were significant issues, 22.9% (24). Additional paperwork plus the time and cost to complete and maintain it were also issues, 12.4% (13). Almost a tenth 9.5% (10) felt less valued as professionals. Students were being negatively impacted by the changed relationship 7.6% (8). Lack of access to appropriate confidential space was a problem, even to the point of the support worker being excluded from campus 4.8% (5). A small number felt that the changed system led to conflicts of interest 3.8% (4).

6. Turning to responses from all respondents, independents and those employed by HEPs, two associated questions were asked:

   a. "To what extent do you agree or disagree with the following statement? 'I feel that the DSA Modernisation, on the whole, is a good thing.'" 4.6% (12) agreed strongly and 41.6% (109) agreed somewhat, with 25.2% (66) disagreeing somewhat and 28.6% (75) disagreeing strongly, Table 31.

Table 31: Responses to question: "To what extent is the DSA Modernisation a good thing?" n=262			
Agree strongly	Agree somewhat	Disagree somewhat	Disagree strongly
4.6% (12)	41.6% (109)	25.2% (66)	28.6% (75)

   b. "To what extent do you agree or disagree with the following statement? 'I feel enthusiastic about the DSA Modernisation.'" 1.1% (3) agreed strongly that they

were, 19.1% (50) agreed somewhat, 36.6% (96) disagreed somewhat whilst 43.1% (113) disagreed strongly, Table 32.

Table 32: Responses to question: "To what extent do I feel enthusiastic about the DSA Modernisation?" n=262			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
1.1% (3)	19.1% (50)	36.6% (96)	43.1% (113)

The contrast between responses to these questions is interesting, almost half agreed that the Modernisation was a good thing, whilst only a fifth felt enthusiastic about it, which could be construed as a negative comment about the Modernisation's implementation and impact.

7. Four questions were asked about the effectiveness of BIS/DfE's and DSA-QAG's communications:

c. In answer to the question "How clearly do you feel BIS/DfE has communicated with you about the DSA Modernisation since it was announced in April 2014?" 1.9% (5) felt very clearly, 8.8% somewhat clearly, 29.8% somewhat unclearly, 47.3% very unclearly and 12.2% not at all, Table 33.

Table 33: Responses to question: "How clearly has BIS/DfE communicated with you about the DSA Modernisation?" n=262				
Very clearly	**Somewhat clearly**	**Somewhat unclearly**	**Very unclearly**	**Not at all**
1.9% (5)	8.8% (23)	29.8% (78)	47.3% (124)	12.2% (32)

d. Respondents were asked, "How well do you think DSA-QAG has communicated about the QAF regarding its purpose?" and replied 1.9% (5) very clearly, 11.8% (31) somewhat clearly, 27.9% (73) somewhat unclearly, 46.6% (122) very unclearly and 11.8% (31) not at all, Table 34.

Table 34: Responses to question: "How well has DSA-QAG communicated about the QAF regarding its purpose?" n=262				
Very clearly	**Somewhat clearly**	**Somewhat unclearly**	**Very unclearly**	**Not at all**
1.9% (5)	11.8% (31)	27.9% (73)	46.6% (122)	11.8% (31%)

e. The following question asked, "How well do you think DSA-QAG has communicated about the QAF regarding its contents?" Responses were 1.5% (4) very clearly, 8.4% (22) somewhat clearly, 29.4% (77) somewhat clearly, 51.1% (134) very unclearly and 9.5% (25) not at all, Table 35.

Table 35: Responses to question: "How well do you think DSA-QAG has communicated about the QAF regarding its contents?" n=262				
Very clearly	**Somewhat clearly**	**Somewhat unclearly**	**Very unclearly**	**Not at all**
1.5% (4)	8.4% (22)	29.4% (77)	51.1% (134)	9.5% (25)

f. The penultimate question in this series asked, "How well do you think DSA-QAG has communicated about the QAF regarding its implementation?", with responses of 1.5% (4) very clearly, 16.9% (18) somewhat clearly, 24.4% (64) somewhat clearly, 56.9% (149) very unclearly and 10.3% (27) not at all, Table 36.

Table 36: Responses to question: "How well has DSA-QAG communicated about the QAF regarding its implementation?" n=262				
Very clearly	**Somewhat clearly**	**Somewhat unclearly**	**Very unclearly**	**Not at all**
1.5% (4)	16.9% (18)	24.4% (64)	56.9% (149)	10.3% (27)

8. The final, free text, question revealed respondents' feelings about the way the Modernisations' changes, including the QAF, had been communicated asking, "What other comments do you have about the communications regarding the DSA Modernisation and/or the QAF?" Table 37 summarises respondents' 313 comments,

Some 45.5% (76) respondents criticised the number, notice and nature of changes to the QAF which they were expected to implement, an issue exacerbated by their ambiguous and perceived inappropriate nature, 41.5% (73). Further, respondents had wanted more effective communications, 24.4% (43), comprising more consultation and explanation, 22.7% (40). Respondents felt that DSA-QAG's poor understanding of NMH support delivery, 20.5% (36) caused some of the difficulties they faced. DSA-QAG's hotline was adjudged of little use or slow, 9.1% (16). Respondents' psychological stress, partially due to feeling threatened by DSA-QAG, 9.0% (15) and negative impact on students, 8.0% (14) were also mentioned. Note that the version of the QAF operative at the time was a 45-page document (DSA-QAG, 2017a).

Table 37: Themes identified in narrative responses to question: "What other comments do you have about the communications regarding the DSA Modernisation and/or the QAF?" n=176 multiple answers allowed							
Too many changes, too time consuming or too little time to implement	**Ambiguous, or inappropriate requirements**	**Comms not effective**	**Not thought through, no rationale given or did not consult**	**Based on mis-conceptions about support delivery**	**Hotline or follow up of little use/ slow response**	**Caused anxiety, stress, felt threatened by DSA-QAG**	**Major student impact**
45.5% (76)	41.5% (73)	24.4% (43)	22.7% (40)	20.5% (36)	9.1% (16)	9.0% (15)	8.0% (14)

9. Respondents were asked "How well does the QAF demonstrate an understanding of the practice of NMH support?". Responses were 0.8% (2) very clearly, 12.6% (33) quite clearly, 34.4% (90) quite clearly and 52.3% (137) very clearly, Table 38. Responses to this question, showed that 86.7% thought the QAF demonstrated somewhat unclear or very unclear understanding of NMH support practice, reinforced the previous question's narrative responses.

Table 38: Responses to question: "How well does the QAF demonstrate an understanding of the practice of NMH support?" n=262			
Very clearly	**Somewhat clearly**	**Somewhat unclearly**	**Very unclearly**
0.8% (2)	12.6% (33)	34.4% (90)	52.3% (137)

10. Three questions asked about the QAF's policies with which NMH providers needed to comply:

    a. To what extent do you agree or disagree with the following statement? "I have found it easy to write/create the policies the QAF requires me/my practice to have." Responses were 2.3% (6) agreed strongly, 14.5% (38) agreed somewhat, 32.8% (86) disagreed somewhat and 26% (68) disagreed strongly; for the remaining 24.4% (64) the question was irrelevant having no responsibility for writing/creating policies, Table 39. However, the two following questions remained relevant as all respondents required training in and were obliged to comply with the policies.

Table 39: Responses to question: "I have found it easy to write/create the policies the QAF requires me/my practice to have." n=262				
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**	**Not applicable**
2.3% (6)	14.5% (38)	32.8% (86)	26.0% (68)	24.4% (64)

    b. To what extent do you agree or disagree with the following statement? "I have found it easy to access the training the QAF requires me/my practice to have." Responses were 1.9% (5) agree strongly, 28.2% (74) agree somewhat, 38.5% (101) disagree somewhat and 31.3% (82) disagree strongly, Table 40.

Table 40: Responses to question: "I have found it easy to access the training the QAF requires me/my practice to have." n=262			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
1.9% (5)	28.2% (74)	38.5% (101)	31.3% (82)

    c. The final question asked, "To what extent do you agree or disagree with the following statement? "Overall, I have found it easy to comply with what the QAF requires me/my practice to have." Respondents answered 3.4% (9) agreed strongly, 26.3% (69) agreed somewhat, 39.3% (103) disagreed somewhat and 30.9% (81) disagreed strongly, Table 41.

Table 41: Responses to question: Overall I have found it easy to comply with what the QAF requires me/my practice to have.” n=262			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
3.4% (9)	26.3% (69)	38.3% (103)	30.9% (81)

Across all 3 questions, the balance of responses, disagreeing somewhat or strongly with the statements, between 60-69%, paint a picture of a framework where compliance and policy writing were difficult, and for which training in compliance was inadequate, indeed absent as DSA-QAG offered none.

11. Some 40.1% (105) reported direct contact with DSA-QAG, they were asked:

a. "This academic year, 2016/17, how have you found working with DSA-QAG, eg responding to your queries, in terms of its speed of response?" Responses were: 19.0% (20) very good, 21.0% (22) somewhat good, 40.0% (42) somewhat poor and 20.0% (21) very poor, Table 42.

Table 42: Responses to question: "This academic year, 2016/17, how have you found working with DSA-QAG…in terms of its speed of response?" n=105			
Very good	**Somewhat good**	**Somewhat poor**	**Very poor**
19.0% (20)	21.0% (22)	40.0% (42)	20.0% (21)

b. "This academic year, 2016/17, how have you found working with DSA-QAG, eg responding to your queries, in terms of its ability to resolve issues completely?" Responses were 8.6% (9) very good, 29.5% (31) somewhat good, 42.9% (45) somewhat poor and 19% (20) very poor, Table 43.

Table 43: Responses to question: "This academic year, 2016/17, how have you found working with DSA-QAG…in terms of its ability to resolve issues completely?" n=105			
Very good	**Somewhat good**	**Somewhat poor**	**Very poor**
8.6% (9)	29.5% (31)	42.9% (45)	19.0% (20)

c. The third question asked, "This academic year, 2016/17, how have you found working with DSA-QAG, eg responding to your queries, in terms of its clarity of response?" with responses of 8.6% (9) very good, 29.5% (31) somewhat good, 41.9% (44) somewhat poor and 20.0% (21) very poor, Table 44.

Table 44: Responses to question: "This academic year, 2016/17, how have you found working with DSA-QAG… in terms of its clarity of response?" n=105			
Very good	**Somewhat good**	**Somewhat poor**	**Very poor**
8.6% (9)	29.5% (31)	41.9% (44)	20.0% (21)

d. Question four asked, "This academic year, 2016/17, how have you found working with DSA-QAG, eg responding to your queries, in terms of its professionalism?"

Responses were: 13.3% (14) very good, 29.5% (31) somewhat good, 41.9% somewhat poor and 15.2% (16) somewhat poor, Table 45.

Table 45: Responses to question: "This academic year, 2016/17, how have you found working with DSA-QAG… in terms of its professionalism?" n=105			
Very good	**Somewhat good**	**Somewhat poor**	**Very poor**
13.3% (14)	29.5% (31)	41.9% (44)	15.2% (16)

Finally, all were asked "To what extent do you agree or disagree with the following statement? "I feel that DSA-QAG treats me as a professional"? Responses were 6.1% (16) agreed strongly, 25.2% (66) agreed somewhat, 35.9% (94) disagreed somewhat and 32.8% (86) disagreed strongly, Table 46.

Table 46: Responses to question: "To what extent do you agree or disagree with the following statement? 'I feel that DSA-QAG treats me as a professional'"? n=262			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
6.1% (16)	25.2% (66)	35.9% (94)	32.8% (86)

Together the responses to this series of questions indicate an approximately 40%:60% split in those who feel DSA-QAG did a somewhat good or very good job when practitioners worked directly with it to those who feel it did a somewhat poor or very poor job. The negatives expressed here are slightly less stark than those, for example, relating to difficulties encountered implementing the QAF or with DSA-QAG's communications with practitioners. However, over 2/3 of responses, 68.7% (180), demonstrated somewhat or strong disagreement that DSA-QAG treated them as professionals, despite significant emphasis in the QAF about the need for and compliance with mandated professional qualifications. This absence of feeling respected permeated the responses to this study.

12. In the first question relating to the DSA-QAG audit, to which all NMH providers were subject, respondents were asked the optional narrative question, "What do you understand are the consequences of not meeting the standards required by the DSA-QAG audit?" The 180 responses, Table 47, showed that 34.4% (62) did not know the consequences, 32.2% (58) believed they would lose their registration, 11.1% (20) that they would have to comply with an improvement plan, 8.3% (15) that they would immediately be unable to support students, 7.2% (13) that their invoices to SFE would not be paid and that their jobs would effectively be lost. Some 12.2% (23) gave invalid answers [which did not answer the question].

Table 47: Themes identified in narrative responses to question: "What do you understand are the consequences of not meeting the standards required by the DSA-QAG audit?" n=180 multiple answers allowed					
Don't know	**Lose registration**	**Comply with improvement plan**	**Barred immediately from supporting students**	**Invoices to SFE would not be paid**	**Invalid answers**
34.4% (62)	32.2% (58)	11.1% (20)	8.3% (15)	7.2% (13)	12.2% (13))

These responses reflected the various and different levels of sanctions which DSA-QAG might have applied in the event of a less than 100% audit result, possibly revealing a level of confusion regarding the hierarchy of remediating actions.

This potential confusion might have been the result of audit guidance being spread across multiple multipage and arguably complex documents, which DSA-QAG summarised online dated 24th February 2017 (DSA-QAG, 2017f):

1. Quality Assurance Framework, 46 pages (DSA-QAG, 2017a)
2. Audit Guidance[33], 32 pages (DSA-QAG, 2017e)
3. NMH Sole Trader Guidance, 32 pages (DSA-QAG, 2017c)
4. Audit and General FAQs, 11 pages (DSA-QAG, 2017d).

As discussed above, DSA-QAG offered no training on the QAF nor the associated audit process, hence the confusion as to consequences should be seen in this light.

13. The 191 respondents yet to be audited were asked, "To what extent do you agree or disagree with the following statement? 'I understand what is involved in a DSA-QAG audit.'" Responses were 2.6% (5) strongly agreed, 26.7% (51) agreed somewhat, 36.1% (69) disagreed somewhat and 34.5% (66) disagreed strongly, Table 48.

Table 48: Responses to question: "To what extent do you agree or disagree with the following statement? 'I understand what is involved in a DSA-QAG audit.' n=191			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
2.6% (5)	26.7% (51)	36.1% (69)	34.5% (66)

14. Three questions were asked of the 71 who had been or were being audited by DSA-QAG:

a. "To what extent do you agree or disagree with the following statement? 'The DSA-QAG audit was/is being carried out professionally'". Responses were 5.6% (4) strongly agreed, 46.5% (33) agreed somewhat, 33.8% (24) disagreed somewhat and 14.1% (10) disagreed strongly, Table 49.

Table 49: Responses to question: "To what extent do you agree or disagree with the following statement? 'The DSA-QAG audit was/is being carried out professionally'" n=71			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
5.6% (4)	46.5% (33)	33.8% (24)	14.1% (10)

b. "To what extent do you agree or disagree with the following statement? 'The DSA-QAG audit went/is going better than I expected it to.'" Some 4.2% (3) agreed strongly, 32.4% (23) agreed somewhat, 49.3% (35) disagreed somewhat and 14.1% (10) disagreed strongly, Table 50.

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[33] Audit Guidance cited is Version 2, dated December 2017 and postdates the 2017 audit cycle. Version 1, which was operative during the 2017 audit cycle, was no longer available at the time of writing, mid-2019.

Table 50: Responses to question: "To what extent do you agree or disagree with the following statement? 'The DSA-QAG audit went/is going better than I expected it to.'" n=71			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
4.2% (3)	32.4% (23)	49.3% (35)	14.1% (10)

    c. The free text question asked, "What was/is the outcome of/progress with your DSA-QAG audit?". Of the 71 being audited, 20 responded, 35% (7) had received an action plan to complete, 50.0% were still being audited, 5.0% (1) had been postponed, 10.0% (2) had passed outright. Comments from 25.0% (5) identified an extended process, highlighting DSA-QAG's delay in returning the audit results. Given the small numbers making the comments, it is difficult to draw broad conclusions from them.

Overall, the answers to these audit-related questions series indicated a slightly better performance by DSA-QAG, as measured by more somewhat or strong agreements with the positive statements, than for example, in communications. However, this comment should be read in the context of the following narrative responses.

15. The study wanted to uncover what it felt like to be audited by DSA-QAG and asked the question, "Please describe your overall experience of the DSA-QAG audit", 71 responded, shown in Table 51. The themes identified the audit cycle as stressful, 38.0% (27) and time consuming, 32.5% (25), the latter possibly exacerbating the former. Respondents complained about poor organisation, support or late provision of action plans, 25.4% (18), an excessive amount of requested detail and literal interpretations adopted by DSA-QAG's auditors, 16.9% (12). DSA-QAG's level of support and level of professionalism was positively noted by 9.9% (7) but negative technology issues were noted, also by 9.9% (7).

Table 51: Themes identified in narrative responses to question: "Please describe your overall experience of the DSA-QAG audit". n=71 multiple answers allowed					
Time consuming	**Stressful**	**Incorrectly run, poor organisation, support or late action plan**	**Too much or irrelevant detail or requirements taken too literally**	**Support was good, professionally conducted**	**Technology issues**
38.0% (27)	32.5% (25)	25.4% (18)	16.9% (12)	9.9% (7)	9.9% (7)

16. The study wanted to know the overall effect that introducing the QAF had on respondents' NMH support supply, asking, "How has following the QAF''s requirements affected your everyday practice of supplying NMH support?" All 262 respondents answered, Table 52.

Newly introduced and burdensome administration was the foremost issue, 40.8% (107). Detracting from time spent in student contact was cited as an issue by just under a third, 31.3% (82) as was less work and lowered income, 30.0% (53). The rigidity of the new framework, which respondents felt devalued and compromised professional judgement was

identified by 12.2% (32). The QAF's constant change in the QAF was seen burdensome by 9.2% (24). Those leaving the profession or experiencing more stress were approximately equal in number, 8.8% (23) and 7.3% (19) respectively.

Table 52: Themes identified in narrative responses to question: "How has following the QAF''s requirements affected your everyday practice of supplying NMH support?" n=262 multiple answers allowed						
More admin	Detracts from student contact	Less work / lowered income/ forced to work for agencies	Rigidity	Constant change, including to qualification requirements	Leaving or left tutoring	More stress
40.8% (107)	31.3% (82)	30.0% (53)	12.2% (32)	9.2% (24)	8.8% (23)	7.3% (19)

17. The Study's penultimate question set related to respondents' feelings regarding the NMH provider's role:

a. "To what extent has this academic year been easier or harder for you in providing NMH services?" with 0.4% (1) finding the year much easier, 8.8% (23) somewhat easier, 49.2% (129) somewhat harder and 41.6% (109) much harder, Table 53.

Table 53: Response to question: "To what extent has this academic year been easier or harder for you in providing NMH services?" n=262			
Much easier	Somewhat easier	Somewhat harder	Much harder
0.4% (1)	8.8% (23)	49.2% (129)	41.6% (109)

b. "To what extent do you agree or disagree with the following statement? "I feel more empowered as an NMH practitioner as a result of the DSA Modernisation." 1.1% (3) agreed strongly, 10.7% (28) agreed somewhat, 21.8% (57) disagreed somewhat and 66.4% (174) disagreed strongly, Table 54.

Table 54: Responses to question: "To what extent do you agree or disagree with the following statement? 'I feel more empowered as an NMH practitioner as a result of the DSA Modernisation.'" n=262			
Agree strongly	Agree somewhat	Disagree somewhat	Disagree strongly
1.1% (3)	10.7% (28)	21.8% (57)	66.4% (174)

c. "To what extent do you agree or disagree with the following statement? "I am thinking of withdrawing from supplying DSA-funded NMH services." Respondents answered 25.2% (66) agreed strongly, 33.3% (87) agreed somewhat, 33.3% (87) disagreed somewhat and 8.4% (22) disagreed strongly, Table 55.

Table 55: Responses to question: "To what extent do you agree or disagree with the following statement? 'I am thinking of withdrawing from supplying DSA-funded NMH services.'" n=262			
Agree strongly	Agree somewhat	Disagree somewhat	Disagree strongly
25.2% (66)	33.3% (87)	33.3% (87)	8.4% (22)

Taken together, these responses indicate widespread dissatisfaction with the NMH provider role post Modernisation, being significantly harder, with reduced empowerment, over half thinking of withdrawing. The context for this discontent was the significant numbers receiving no student referrals, onerous bureaucracy, many being forced to go to agencies to seek work, both resulted in significant income reductions.

18. The study asked respondents' about the Modernisation's effect on their students, asking "What has been the impact of the DSA Modernisation on your own tutees?"; 79.0% (207) respondents provided input, Table 56.

Table 56: Themes identified in narrative responses to question: "What has been the impact of the DSA Modernisation on your own tutees?" n=207 multiple answers allowed							
Paperwork causes tutorial time loss. Students find the paperwork demeaning	Slowness in getting support, coordination difficulties between as parties	Limited impact, have shielded students from its effects	Lack of flexibility, means students' needs not actually met	Students stressed and/or confused	I've had no new students	Loss of private / confidential meeting space means tutorials take place in public places	Difficulties switching supplier means students unable to exercise choice
31.4% (65)	29.5% (61)	24.6% (51)	23.2% (48)	19.3% (40)	6.3% (13)	4.3% (9)	4.3% (9)

Respondent's comments reflected their foremost concern that, what some termed "precious", tutorial time was wasted on additional administration, eg the requirement to ask adults at each tutorial whether they wanted a break and then recording the duration of same on a timesheet was seen as a demeaning a waste of time, 31.4% (65). Respondents found the changes delayed support set-up, 29.5% (61), that coordination with other support workers was harder eg Specialist Study Skills tutors working with MH Mentors leaving gaps in supporting student with multiple needs. A quarter, 24.6% (51), stated that they had shielded their students from the QAF's negative effects. Inflexibility of the QAF was again mentioned, by 23.2% (48). Some 19.3%, (40) mentioned that the changed process for nominating NMH providers led to delays in students accessing their support contributed to confusion, extra stress and anxiety for the students. Again, the themes of respondents receiving no referrals, 6.3% (13), and the loss of confidential meeting space 4.3% (9) were mentioned. Students were also seen as affected the difficulties in changing NMH provider 4.3% (9).

5.4.1.2.   *Thematic analysis of narrative responses*

Respondents provided rich and numerous narrative comments which were examined through thematic analysis, see S.4.3.2.4, yielding Table 57. See Appendix 8, for the themes presented against the verbatim comments.

Table 57: Themes identified in narrative responses
1. A previously working system of support had been compromised, 2. Already vulnerable students were caught in processes which exacerbate their disabilities, 3. A significant amount of a student's one-to-one tutorial support was wasted, 4. Mandated administrative paperwork was ill-informed and inimical to good support practice, 5. Arbitrary restrictions were placed on tutors' abilities to respond to students' needs, 6. The system was inflexible and was not based on the reality of the needs of students with disabilities, 7. HEP/FECs' ability to exercise their duty of care to students had been compromised, 8. One-to-one tutorials were increasingly carried out in public spaces to students' detriment, 9. Agencies were significant beneficiaries, winning referral business but at times struggling to find suitable tutors to fulfil their supply obligations, 10. Administrative and audit processes and requirements were ill thought-through, introduced with neither consultation nor pilot, nor appeal procedure, 11. Revisions to QAF were issued multiple times during the academic year, often with insufficient time to implement with the required instant compliance, 12. Numerous HEP/FECs had been forced to reduce their inhouse service provision by significant pay cuts, laying off or not contracting for many qualified and specialised staff, 13. Independent tutors were forced to register with agencies, being paid 30-50% less than when working independently, sometimes at the same HEP at which they had tutored, 14. Many small NMH providers businesses were being destroyed due to a non-functional new referral system, 15. Independent respondents were thinking of withdrawing from NMH practice, 16. DSA-QAG and DfE did not command the confidence of the profession.

5.4.1.3.   *Thematic analysis of narrative responses - discussion*

1. **Accessing support:** Respondents felt that a previously working system of support had been significantly degraded. Their students, already vulnerable by virtue of their disabilities, were caught-up in processes which could exacerbate their disabilities. They believed that students experienced additional stress through waiting longer to receive both AT and NMH support. They reported that the Modernisation, which meant that for many students their HEP/FEC did not provide their NMH support, was confusing and that students with Autistic Spectrum Disorder (ASD) or Mental Health (MH) issues were

the most negatively affected. Where HEPs were not themselves providing support to their own students, respondents felt that these HEPs' ability to fully discharge their duty of care had been compromised,

2. **Changes to NMH provider qualifications:** Respondents identified that changes to qualifications for tutors working with MH and ASD students disqualified those already practising but without the newly mandated qualifications, leading to a loss of tutors. Conversely, suitably 'qualified' replacements were seen as having no knowledge of study skills but only of therapeutic issues, which had little practical use in advising tutees about their studies. Respondents believed that numerous students would be unable to navigate the new processes and so fail to access support,

3. **Paperwork & administration:** New paperwork led to a significant amount of a student's one-to-one tutorial support being wasted by asking sometimes demeaning questions and in administration merely for compliance purposes. The new paperwork detracted from delivering effective support. They thought that the mandated administrative paperwork was ill-informed of best support practice and may even have been inimical to it,

4. **Effect on working practices:** Respondents felt that arbitrary, inflexible restrictions were being placed on tutors' abilities to respond to students' needs, for example by constraining the established use of RWTs such as Skype to deliver support. From being 'needs-led', in accordance with best practice, they thought the system had become 'paperwork-led', detrimental to the students it was meant to benefit. Numerous found it difficult to obtain appropriate locations in which to deliver support. Some were forced to deliver tutorials in public spaces, contravening students' need for confidentiality, best professional practice, the requirements of professional associations and the QAF. Agencies were seen as significant beneficiaries of the changed system, being selected by Assessment Centres, yet ironically sometimes unable to find suitable tutors to fulfil their supply obligations delaying support provision,

5. **Audit and administration:** Administrative and audit processes and requirements were poorly thought-through, time consuming to comply with and introduced without consultation, pilot or appeal procedure. Respondents complained about QAF revisions being issued frequently accompanied by unrealistic expectations of immediate compliance, see for example a Jiscmail exchange amongst members of the Association of NMH Providers which discussed the requirement for immediate compliance with the QAF V2, despite prior discussions about the need for 3-6 month lead-times (Coiley, 2017). DSA-QAG's communications, often seen as intimidating, left practitioners confused by what was/was not mandatory,

6. **Reduction in support work offered:** Respondents observed that numerous HEPs/FECs had been forced to reduce their inhouse service provision making significant pay cuts or lay-offs, or not offering 3rd party contracts for many qualified and specialised staff. Respondents had therefore been forced to register with agencies to obtain any work but paid 30-50% less than previously and, gallingly for those affected, sometimes at the

same HEP where they had previously been tutoring. For independent NMH providers, as opposed to those who had been employed by HEPs/FECs, many reported that their businesses were being destroyed due to a non-functional new referral system (2-quote), see Appendix 4, S.10. In DSA-QAG's March 2018 Newsletter reporting on the results of the first round of the new audit process, over half (298) of the 589 registered providers were reported as having received 'zero students' (DSA-QAG, 2018a). In this Study over 60% of 'independent' respondents were thinking of withdrawing from NMH practice citing catastrophic loss of income, undermining of professional judgement and significant stress,

7. **Lack of confidence in the organisations responsible for the changes:** Although some of this Study's respondents felt elements of the Modernisation had benefit, the perceived shortcomings in its overall implementation meant that neither DSA-QAG nor the DfE commanded their confidence.

5.4.2.   Triangulation using SFE's acknowledgement of HEPs' concerns

SFE identified 12 areas in which NMH practitioners had expressed concern with the 2-quote system, implemented as the DSA-QAG NMH provider database, Appendix 4, S.10 (SFE, 2015), and referred to in item 6, above, as causing independent NMH providers loss of business. Table 58, below, shows the extent to which these 12 areas correlate to the themes which concerned respondents to this Study, as shown in Table 57, above. Although this study addressed wider issues than just the introduction of the 2-quote system, the correlation shows commonality in 9 of the 12 issues acknowledged SFE, strongly supporting the reliability of this study.

Table 58: Issues raised by NMH respondents which correlate SFE's list of issues raised by HEPs 2015	
Issue identified by SFE (SFE, 2015)	**Respondents' common themes identified in Table 57**
1. Assurance of quality supply	Theme 2.
2. Retention of trained staff	Themes 13, 14 & 15.
3. Administrative complexity	Themes 2, 3, 4, 5, 6 & 10.
4. Loss of institutional choice and control	Themes 7, 9, 12 & 13.
5. Issues with site access	Themes 7 & 8.
6. DBS checks	
7. Issues with access to internal systems	
8. Managing student complaints	Theme 7.
9. Investment in training	Theme 2.
10. Loss of integration between institution and supplier, effect on interim support	Theme 2, 7 & 9.
11. Validation of qualifications	
12. Students with multiple needs and administrative burden for the student	Themes 2 & 6.

5.4.3.   Summary and conclusion

The study represented a broad sector cross-section, albeit self-selected: 44.5% of NMH providers, 8.7% of support workers; 44.8% worked either wholly or partially through agencies, 52.8% were sole practitioners and 21.6% worked for HEPs/FECs. Triangulation

identified that themes identified were consistent with issues acknowledged by SFE suggesting that this Study's data are reliable.

Independent NMH providers experienced reduced student numbers, therefore income, due to the new referral system, forcing numerous to work through agencies to mitigate financial impact, despite significantly lower hourly rates. Agency respondents benefitted, gaining students. The issue of pay remained unaddressed, frequently mentioned on the ADSHE JiscMail forum, eg posts 1/6/19-20/6/19 primarily regarding issues of pay differentials between agencies and the 'cut' taken by agencies of DSA awards (JISC, 2019) and potential benefits of union membership, posts from 6/4/20 (JISC, 2020).

Post-Modernisation, for those not employed by HEP/FECs, relationships with HEPs/FECs were more distant, 31.7%; as support workers external to HEPs/FECs they could no longer discuss student-related issues directly with the students' institutions. Paperwork and the costs of managing it had increased, respondents commented most unfavourably, that the paperwork requirements reflected in those who mandated it, DSA-QAG and at one remove the DfE, a lack of understanding of the nature of NMH support delivery. Some 12.4%, over a tenth, felt less valued professionally and loss of confidential space was identified by 4.8%. However, the QAF mandated such space for tutorial delivery (DSA-QAG, 2018c, pp. 21, S2.3). The issue remained current, recurring on the ADSHE JiscMail forum, 12 posts on 23/10/18 (JISC, 2019), 15 posts between 19/6/19-20/6/19,

Although the Modernisation was supported somewhat or strongly by almost half, 48.2%, almost 79.2% felt unenthusiastic about it, supporting the notion of respondents' disquiet about its implementation.

All aspects of communications by BIS/DfE and DSA-QAG were rated somewhat or very unclear by an average of over 80%, particular issues being the number and frequency of QAF changes, 45.5%, and the requirement for fast implementation, worsened by perceived ambiguity and inappropriateness, 41.5%. Respondents wanted more effective communications, 24.4%, comprising consultation and explanation, 22.7%. Some communication difficulties were ascribed to DSA-QAG's perceived inadequate understanding of NMH provision. Issues with communications were demonstrated by poor knowledge of the consequences of failing audit and, for those awaiting audit, of what an audit comprised. Just over half agreed strongly or somewhat that their audit was carried out professionally, 52.1%, but only 36.6% agreed somewhat or strongly that the audit went better than expected.

Working with DSA-QAG was problematical regarding poor speed of response, 60.0%, extended resolution times, 61.9%, perceived unprofessionalism, 57.1%, and lack of clarity in responses, 21.9%; 68.7% did not feel they were treated as a professional.

Regarding the QAF, compliance was hard, 69.2%, writing policies for it difficult, 58.8%, with poor access to training 69.6%. The QAF imposed more administration, 40.8%, detracted

from student contact hours, 30.3%, had reduced referrals/led to loss of income 30.0% and was rigid, 12.2%. Narrative comments revealed it was intensely disliked. Although rigid, on occasion and faced with practitioner backlash, the QAF was changed. For example, its initial constraint on delivering tutorials via RMTs such as Skype was rescinded after sector response and evidence provided to DSA-QAG and DfE, eg, Newman and Conway (Newman & Conway, 2017b).

This first year of the Modernisation had been somewhat or much harder for 90.8%; 58.8% thought of withdrawing from the sector and 88.2% disagreed somewhat or strongly that the Modernisation had empowered them as an NMH practitioner.

No respondent mentioned potential gains for students. Added paperwork, demeaning questions, difficulties coordinating support, delays in setting up support and extra stress were identified as issues affecting disabled students negatively. A quarter of respondents felt they had shielded their students from these effects.

The study identified major discontent with the Modernisation's implementation, a belief that it did not benefit students and a significant lack of confidence in DfE and DSA-QAG.

5.5. Study 5: One year in - effects of changes on HEPs' disabilities services functions

5.5.1. Responses

In total, 21 HEPs completed this mixed method, semi-structured online survey, 17.5% of 120 HEPs represented on NADP's *Heads of Service* Jiscmail list (Conway, 2017), see S.4.3.2.2 for use of Jiscmail. Demographically, 28.6% (6) had ≤10,000 undergraduates, 42.9%, 9 ≥10,001 ≤20,000, 28.6% (6) >20,000, Table 59 and Figure 24, present the demographics in both tabular and chart format, respectively. In the narrative, below, the survey software's anonymised respondent ID is retained to provide an audit trail to original data.

Table 59: Number of students studying at respondents' HEPs. n=21				
0-5,000 students	**5,001-10,000 students**	**10,001-20,000 students**	**20,001-30,000 students**	**>30,000 students**
14.3% (3)	14.3% (3)	42.9% (9)	14.3% (3)	14.3% (3)

Figure 24: Number of students studying at respondents' HEPs
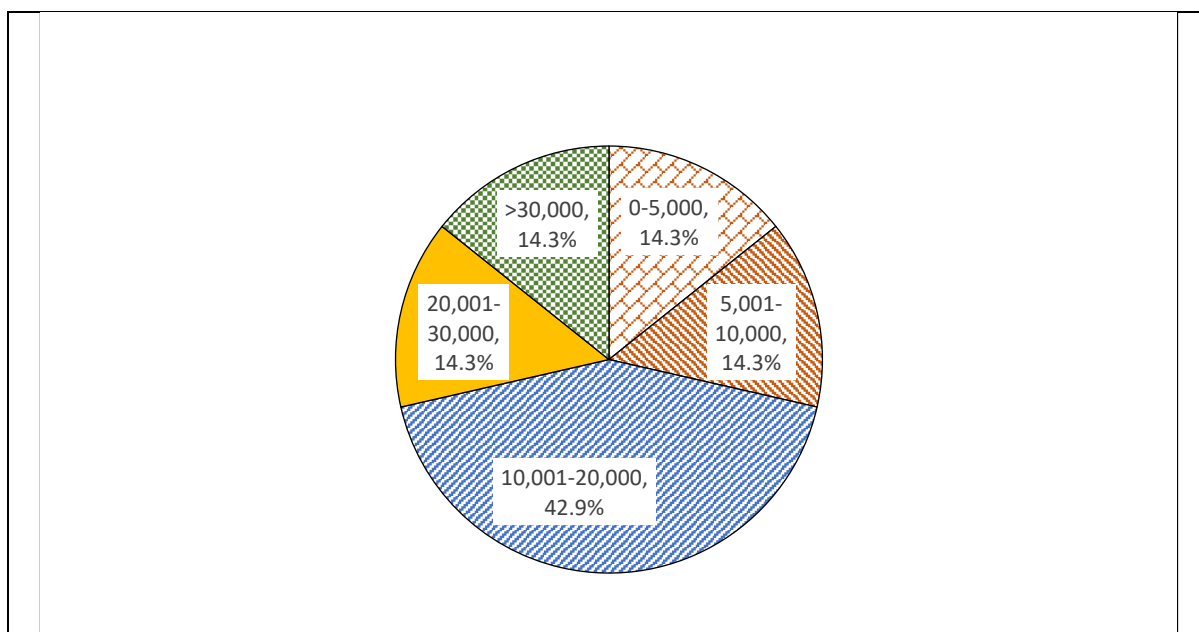
5.5.2.   HEPs Registered as NMH Providers

Of the total 21, 71% (15) were registered as NMH providers.

Question: To what extent do you agree with the following statement: "We are satisfied with the in-house provision of NMH support delivered this academic year to our SpLD students"?

Only 1 reported that it had changed to in-house NMH provision for AY2016/17. All agreed either somewhat or strongly that they were happy with in-house provision, Table 60.

Table 60: Response to statement: We are satisfied with the in-house provision of NMH support delivered this academic year to our SpLD students. n=15			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
86.7% (13)	13.3% (2)	0	0

The reported rationale for continuing in-house provision was that it had historically delivered high-levels of satisfaction (Respondent reference: 24419940[34]), coherent and holistic support (24419940, 24764096), control over service quality and the relationship with the HEP's own students (24442326), and given the ability to ensure appropriate academic liaison (24419940). All respondents had conducted student feedback exercises regarding quality of service, giving the following examples:

> "Typical student favourable comments…included: Continuity of support tutor, sympathetic support, friendly comfortable environment, feeling validated and valued, understanding of academic requirements, being impressed by the overall service received" (24419940),

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[34] Respondents in this Study are referenced by a unique code allocated by the survey software to provide an audit trail. The 8-digit code was one part of a 20-digit code, hence respondents' identities are protected.

"A rating of 80% excellent regarding [NMH] tutor quality and 20% good; belief that support tutoring and influenced decision to continue studies 84% completely or partially true, only 16% believed continuance was not influenced by the support received. Lowered anxiety due to support tutoring was reported by 88% of students" (24442326),

"Levels of satisfaction with tutor support were very high, 82% rated 4/5 or 5/5" (24562966), "92% rated support as good or excellent" (24622672), "95% highly satisfied" (24624188), "95% stated support had a positive impact on studies and gave numerous testimonial statements" (24622411) "91% are totally or mostly satisfied with their support" (24764096).

Question: To what extent is your service able to provide support for your SpLD students in space which is "comfortable, confidential" and "takes account of their disabilities needs" and is not in "public open space"? (QAF 2.4, 4.4); (DSA-QAG, 2017a)

73.3% (11 of 15) respondents reported that they delivered such space for all their SpLD students whilst 26.7% (4) delivered it for the majority of their SpLD students, Table 61.

Table 61: Responses to question : To what extent is your service able to provide support for your SpLD students in space which is "comfortable, confidential" and "takes account of their disabilities needs" and is not in "public open space"? n=15				
Fully able to provide	**Provide for the majority**	**Provide for the minority**	**Do not provide**	**Insufficient information to answer**
73.3% (11)	26.7% (4)	0	0	0

Comments ranged from "all tutors currently have individual offices" (24442326, 24661459)", to "dedicated rooms" in libraries or the student support centre (24442326, 24468065, 24420859). For one respondent, there was a difference between the support delivered by the in-house team, in closed accommodation, and that given by 3rd party providers delivering support to students at that HEP, in public space (24764096). Three respondents noted insufficient rooms at some locations (24622411, 24747188, 24694720). One respondent noted that not all students were comfortable in closed accommodation, preferring somewhere "neutral" (24747188).

Question: What has been the effect of registering as an NMH provider on your services workload?

Only one HEP responded no significant change, 93.3% (14) responses stated issues regarding workload increase, "unreasonable levels of admin … across the board" (24448707). Initial staff registration and audit preparation were commonly cited areas of increase.

Audit preparation: This activity was felt particularly onerous, especially the need to evidence tutor confirmations of forthcoming tutorials and student responses. Respondents identified difficulties in using existing IT systems and associated procedures to extract the

new data required by the audit, especially in the short timescales often demanded for compliance (24419940, 24468065).

Tutorial paperwork: The required session Individual Learning Plan (ILP) (QAF Template 6); (DSA-QAG, 2017a) was seen as irrelevant "not used by us in HE" [Typically, termly ILPs had been used to guide student learning]. A "massive increase in workload…we have gone from 3 summary timesheets per term to over 80 records per student (including weekly reminders)…our systems are not set up for this" (24468065). This increased paperwork was also seen as detracting from the useful time within tutorials (24419996, 24449540, 24694720). Three comments encapsulated the views of all, "it has been an admin nightmare given the large number of updates to the QAF, lack of clarity around the requirements…occupied 50% of time January to March" (24764096), "the constant changes to the standards over the year has been very challenging to keep up to speed" (24468065) and "it feels as though students are the least important part of the process" (24468065).

Irrelevance of audit paperwork: The audit and associated QAF paperwork were seen as irrelevant to any form of assessment of the quality of tutorial support delivered, for example, "The audit is a paper checking exercise that has no link to the quality of support delivered and outcomes" (24764096).

Frequency of QAF update: Respondents complained bitterly about frequency and unclear QAF updates, succinctly stated, "…it has been a nightmare…[keeping track of these]…occupied 50% of time January–March" (468065); another commented, "We have introduced and reintroduced new administrative practices over the year" (24622411).

Financial pressures: Financial pressures, coupled with doubt that changes made in compliance would be sufficient to pass audit, led to frustration, "Administration has doubled. Income has halved due to market pressures on charges … [and] we have jumped through various hoops, but we know it won't be enough come the audit" (24661459).

Question: If you have been audited, please summarise your [year 1] audit experience.

46.7% (7 of 15) had been audited, 71.4% (5 of 7) expressed dissatisfaction with some part of the audit, 14.3% (1 of 7) partially satisfied (24468065) and 14.3% (1 of 7) satisfied (24747188). This latter was alone in successfully passing the audit without the need for an action plan (DSA-QAG, 2017e).

Audit preparation: One respondent commented, "Preparing for the audit has been overwhelming … with unreasonable demands" (24448707), a view expressed by others in previous answers.

Conduct of the audit: Respondents expressed frustration that considerable material which they had prepared concerning "feedback, or quality, or improvements to service" was ignored (24419940) and that the audit "… only focused on a small number of areas" (24468065). There was disbelief with lack of understanding of the nature of NMH provision,

"[the] auditor seemed unable to grasp the fact that the Specialist Study Skills support service and the tutors working in it were part of the University and did not work with students from other universities" (24449540). Although the audit was "very process driven…it went reasonably well" (24468065).

Interaction with the auditor: There were issues in terms of his/her understanding of NMH provision (24449540), see above point, and interpretation of standards (24468065). Conversely, one respondent commented that, "the auditor was friendly and helpful, and explained the process and helped us enormously" (24764096).

Follow-up action plan (DSA-QAG, 2017e)**:** 42.9% (3 of 7) expressed exasperation. Actions plans were not received within the stated timescales, requiring chasing (24419940, 2448707, 24764096). For one, "completing the action plan has been horrendous" citing as an example the need for a complaints policy, which had to go through multiple submission attempts to ensure it satisfied the audit even though it already satisfied the sector body, The Office of the Independent Adjudicator (24764096).

Question: What further points would you like to make about the changes to the DSAs and their effects on your in-house NMH provision support provision for SpLD students?

Of the 10 responses, 33.3% (3) stated that the QAF and the associated audit looked solely at process and did not address quality from students' perspectives (24419940, 24468065, 24624188), summarised by, "[the] administrative practices required… do not appear to aid in effective delivery of support" and appear "to have been designed by people who do not have specialist knowledge in the field" (24624188).

A further 2 commented that the provision of support through 3rd parties who had no connection with the HEP was confusing for students and, when things went wrong in that provision, the HEP had neither knowledge of, nor remit to rectify the problem (24622411, 24562966). HEPs' ignorance of the support provision's quality for its students was a concern (24622411).

Other concerns included those related to remote support, for example, for "students on placement [or on an] open learning course who like remote email support, which has been stopped" (24764096), see S.5.2.1.5. A further concern was the lack of "framework [to support] HEPs in implementing the new requirement (24747188).

5.5.3.   NMH Provision via 3rd Party Providers

This section describes the findings of those respondents where 3rd party NMH providers delivered support to their students; 28.6% (6) exclusively used this model in the AY2016/17 academic year, having moved to it from in-house provision in previous years. A further 7 reported a mixed model of some in-house as well as some 3rd party NMH provided support. One reported moving to this model in the current year.

Question: To what extent do you agree with the statement: "We are satisfied with the support 3rd party NMH providers deliver to our students"?

Of the 13 responses, fewer than half felt any degree of satisfaction whilst 5 felt either somewhat or strong dissatisfaction, 2 respondents felt they had insufficient information to give an opinion, Table 62.

Table 62: Responses to statement: We are satisfied with the support 3rd party NMH providers deliver to our students. n=13				
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**	**Insufficient information to answer**
23.1% (3)	23.1% (3)	23.1% (3)	15.4% (2)	15.4% (2)

Of the 8 narrative responses, 3 commented upon the inability of some larger 3rd party providers to deliver support due to their lack of capacity; they did not have sufficient qualified and DSA-QAG-registered NMH support workers 'signed up on their books' in the locations where they had been awarded DSA support contracts (24562966, 24624188, 24764096) leading to complaints by students to their HEPs which felt they could do little about the situation, being constrained by the QAF from so doing (DSA-QAG, 2017a). Two respondents commented favourably on the quality of the support workers delivering the sessions "which is not in question" (24524766) and the benefit of having a longstanding relationship with a supplier (24424068). One respondent discussed an apparently significant conflict of interest in NMH provision by the HEP, but without elaboration (24747188). One respondent commented that little information was received from 3rd party suppliers about that HEP's students, see also next question, and questioned 3rd party suppliers' ability to provide appropriate space for NMH sessions. Respondents additionally worried about safeguarding issues (24764096).

Question: To what extent are you satisfied with the level of feedback about your SpLD students, received from NMH providers?

Lack of feedback from 3rd party providers was an issue with no respondent very satisfied and only just over half of the 13 only somewhat satisfied, Table 63.

Table 63: Responses to question: To what extent are you satisfied with the level of feedback about your SpLD students, received from NMH providers? n=13				
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**	**Insufficient information to answer**
0%	53.8% (7)	7.7% (1)	15.4% (2)	23.1% (3)

Six additional textual comments highlighted dissatisfaction, identifying either ad-hoc, partial, non-existent feedback or significant differences between providers (24424068, 24468065, 24524766, 24622881, 24624188, 24622411). Somewhat bitterly, 2 commented that they were now forced to add additional processes to formalise and/or monitor the

feedback process, even assuming the HEP knew who was providing support to its students (24424068, 24524766). One HEP observed that 3rd party providers avoided notifying the HEP when unable to provide support, leaving students without support (24624188).

Question: To what extent are your 3rd party NMH providers able to provide support for your SpLD students in space which is "comfortable, confidential" and "takes account of their disabilities needs" and is not in "public open space"? (QAF 2.4, 4.4) (DSA-QAG, 2017a)

Only 1 respondent stated full space provision to the required standards, with lack of feedback reported as an issue regarding compliance, 23.1% (3) provided for the majority, just under half (6) had insufficient knowledge to answer, Table 64.

Table 64: Answers to question: To what extent are your 3rd party NMH providers able to provide support for your SpLD students in space which is "comfortable, confidential" and "takes account of their disabilities needs" and is not in "public open space"? (QAF 2.4, 4.4). n=13				
Fully able to provide	**Provide for the majority**	**Provide for the minority**	**Do not provide**	**Insufficient information to answer**
7.7% (1)	23.1% (3)	7.7% (1)	15.4% (2)	46.2% (6)

Seven respondents provided additional narrative information, 3 commented on their HEP's general lack of space and inability to service in-house needs (24420001, 24524766, 24562966). One discussed the availability of bookable rooms, but only for group work, not one-to-one tutorials, observing that where 3rd party provision had been delivered in "limited access areas…some students have felt uncomfortable" (24468065).

One respondent's in-house contract covered the "majority" of the supply, however, for the balance supplied by 3rd parties tutorial delivery was in public space "in contravention of the QAF rule" (24524766). One commented having received no feedback at all from any 3rd party supplier and so had no knowledge of the meeting locations, noting also that "externals … do not have the same access to space as internal university staff" (24622411).

One respondent succinctly stated, "Of course the student is trapped in the middle".

Question: Please describe the steps have you taken with your 3rd party NMH suppliers regarding "working on-site familiarisation" eg they are aware of your organisation's codes of practice, are identified/identifiable on campus etc (QAF 2.7) (DSA-QAG, 2017a)**.**

Thirteen responded, 5 stated explicit contact with 3rd party providers to give some form of briefing; 3 provided briefing upon request and 4 offered none, although one was considering so doing next academic year; 1 offered web-based briefing material. As HEPs were not always aware of which 3rd party providers supported their students, familiarisation could only be provided, "… with those agencies that engage with the university" (24747188).

Briefings varied by nature. One provided a detailed briefing, endorsed through solicitors, offered to all 3rd party providers when the HEP became aware of them (24524766). Room booking information was supplied by 1 HEP although nothing was offered regarding codes of practice (24420001). Policy, Health & Safety inductions or a general familiarisation were provided by 4 HEPs (24419940, 24424068, 24431095, 24524766).

Question: What feedback, positive or negative, have you received this academic year from your SpLD students regarding the 3rd party supply of their NMH support? Please illustrate with a summary of any data you may have.

Of 13 responses, 7 stated receiving no feedback regarding 3rd party supply whilst 3 commented that agencies were known to have been unable to fulfil student requests for support (24524766, 24562966, 24624188) and 1 commented that it had received complaints concerning unsuitable tutorial space (24420001). One respondent commented that several

students had asked to come in-house after word-of-mouth recommendation (24468065). Only 2 respondents expressed themselves generally satisfied, ie with no or few negative reports (24622247).

Question: Are there further points you would like to make about the changes in the DSAs and their effects on 3rd party NMH support provision for SpLD students?

Seven further narrative responses discussed problems in ensuring quality and consistency of support for their SpLD students when 3rd parties delivered support, these included lack of flexibility shown by large 'agencies' for part-time mature students, students being confused both by the idea of their HEP not supporting them and the complexity of using 3rd parties. Additionally, HEPs were unable to provide interim support whilst waiting for the extended DSA process to operate and the reputational damage to an HEP when the support did not work, even though they were not contracted by SFE to provide support (24420001, 24419940, 24424068, 24468065, 24524766, 24622411, 24764096).

Question: To what extent do you agree with the following statement? "We can deliver integrated support to SpLD students more effectively under the new NMH support provider model (post April 2016) compared to the previous NMH support provider model (pre-April 2016)."[35]

The responses show that, by a ratio of over 2:1, respondents felt that delivering integrated support was harder using the new 3rd party model than under the former model where HEPs were responsible for support delivery, Table 65.

Table 65: Response to question: To what extent do you agree with the following statement? "We can deliver integrated support to SpLD students more effectively under the new NMH support provider model (post April 2016) compared to the previous NMH support provider model (pre-April 2016). n=13			
Agree strongly	**Agree somewhat**	**Disagree somewhat**	**Disagree strongly**
7.7% (1)	23.2% (3)	69.2% (9)	0

In further narrative responses, one HEP noted that they worked "closely with the provider so students with multiple support types have some joining up" (24524766). Another commented that the new NMH support model, which tried to introduce a "market-based provision" was highly inappropriate for SpLD students who "do not understand that there is a market" (24562966) and failed to deliver a positive experience ((24764096).

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[35] Individual aspects of the changes to DSA as required by DSA-QAG through the issue of the Quality Assurance Framework came into force over approximately 12 months in readiness for full operation for AY2016/17. The change discussed in this question was operable from April 2016.

Question: Does your HEP/FEC have an organisation-wide project to implement an inclusive teaching and learning environment?

Some 71.4% (15) responded affirmatively, 28.6% (6) answered negatively.

Nineteen narrative responses revealed a variable picture regarding progress towards ILEs. In 5 cases (24424068, 24431095, 24562966, 24622672, 24694720) the respondent (Head of Disability Service or equivalent role) led the project, whilst a further 8 were participants in their HEP's project (24420001, 24420859, 24442326, 24468065,24622247, 24624188, 24747188, 24764096). At 2 HEPs senior management showed "no engagement" with inclusivity, to the respondents' frustration and despite efforts to move the agenda forward notwithstanding (24420001, 24562966). Some 28.6% (6) HEPs possessed no institutional project regarding inclusivity.

The maturity of the institution-wide ILE projects varied, some at the early stages of policy formulation (24424068), others with major active projects and workstreams (24694720). Others had partial implementations of facilities such as lecture capture (24442326) but a number had encountered significant 'push-back' from academics, some of whom refused to embrace it, causing major policy rethinks (24420001, 24442326). The more successful projects appeared those which were led by multidisciplinary teams.

HEPs' technological capabilities also played a part in their ability to use technology to further inclusion. One reported success with "widespread lecture capture" due to "excellent technological facilities", despite senior management's lack of interest in inclusivity (24562966). Contrastingly, another reported that initiatives had "…absorbed weeks of time and are now running into difficulties due to IT resource and security issues (24661459).

One respondent noted that "a flaw in the government's Modernisation agenda is an inadequate reference to inclusive practice in the Teaching Excellence Framework" and that, until this absence was remedied, inclusivity would not be adequately pursued (24420001).

5.5.4. Discussion

Based on this study involving 21 English HEPs, in late-AY2016/17, the Modernisation's first operational year had produced no discernible benefits for students receiving NMH support. Onerous new paperwork requirements had reduced respondents' capacity to deliver support. For some, the ability to safeguard students was felt to be compromised. The QAF (DSA-QAG, 2017a) and associated audits by the DSA-QAG were seen as failing to improve the quality of delivered support as viewed by students. Progress with implementing inclusive teaching environments was variable, managements ranged from engaged to disengaged.

Those respondents which chose the model where they registered as NMH Providers had mostly preserved their ability to control quality, availability and appropriateness of support

location for their SpLD students but at major cost in onerous and apparently meaningless extra administration against a reduced income base.

Respondents exclusively choosing the 3rd party supply model, whilst escaping most of this administrative load, expressed significantly less satisfaction regarding the support of their students, which latter were confused by the model and "trapped in the middle". Feedback from 3rd party suppliers was mainly poor to non-existent, locations where support was delivered were more likely to be inappropriate, contravening the QAF, S2.4, S4.4 (DSA-QAG, 2017a)], support from 3rd parties was sometimes not available, yet this information was not always communicated back to respondents. Hence, these respondents had much less to no visibility than hitherto about the conduct of NMH support delivered, raising questions regarding their ability to discharge their duty of care.

DSA-QAG audits were pointlessly detailed, required significant investment in time and effort, and looked at the wrong metrics if quality improvement were their aim. Audits were conducted by those who seemingly did not understand the business of NMH delivery, nor the impact of multiple changes to QAF requirements, including retrospective ones, QAF changes were poorly communicated and inadequately explained, they were too frequent and often expected an impossible, near-instant compliance.

Some respondents reported considerable progress at policy and practical levels in implementing inclusive teaching and learning, having well-constructed projects, supported by senior management. Others reported little institution-wide progress and disinterested managements. Acceptance by academics of the concept of inclusive teaching could be problematical. The TEF's omission of an explicit metric or assessment of Inclusive Teaching and Learning (ITL) was seen as limiting progress in its achievement.

5.6.   Study 6: NMH providers' response to DSA-QAG NMH Audit Roadshow

Twenty responses were received to this mixed method, semi-structured, online questionnaire, representing ~16.7% of the "over 120" total reported by DSA-QAG as attending its Audit October 2017 Roadshows in London and Birmingham (DSA-QAG, 2017i).

5.6.1.   Demographics: Type of organisation

Respondents self-identified as solely NMH providers, 25.0% (5), HEP/FEC, 35% (7) or NMH provider plus another function, eg charity, 40% (8), Table 66 and Figure 25, present the demographics in both tabular and chart format, respectively. Respondents employed between 1-5 staff, 35.0% (7), 6-19 staff 35.0% (7) or 20 or more, 30.0% (6); there was equal attendance between the two locations.

Table 66: Respondents' NMH roles. n=20		
NMH provider and another function	**Solely an NMH provider**	**HEP/FEC registered as NMH provider**
40.0% (8)	25.0% (5)	35.0% (7)

Figure 25: Respondents' NMH Roles
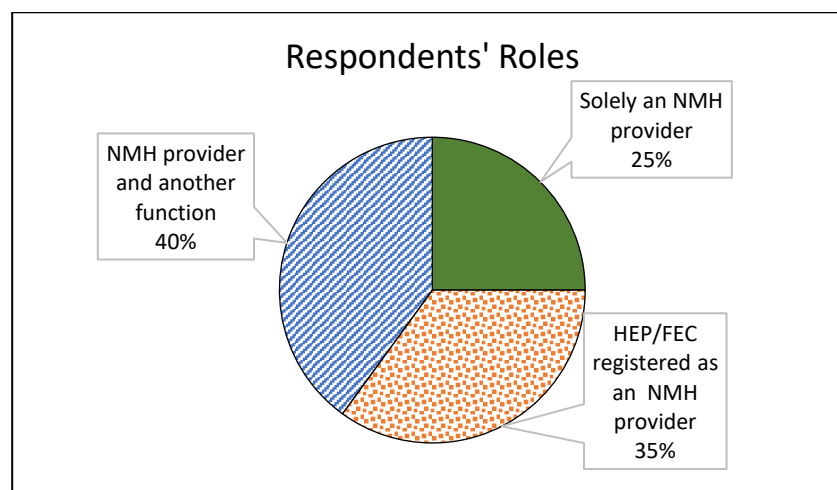
Note: For the following questions, narrative responses are shown in Appendix 11, S.17.

5.6.2.   How satisfied were you with the content of the presentation about DSA-QAG (Given by Karen Docherty, DSA-QAG Chief Executive Officer)?

Some 60.0% (12) were either somewhat or very dissatisfied, Table 67. Narrative comments identified dissatisfaction with DSA-QAG's role, remit and confusing relationship with DfE/SLC/SFE, its request for leniency in its delays whilst giving none to the practitioners it audited and frustration with the presentation taking time from Q&A.

Table 67: How satisfied were you with the content of the presentation about DSA-QAG? n=20			
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**
10.0% (2)	30.0% (6)	50.0% (10)	10.0% (2)

5.6.3.   How satisfied were you with the content of the presentation about Disabled Students' Allowances (Given by Greg Boone, Department for Education, DSAs policy team leader)?

The balance of responses was negative, 65.0% (13) were somewhat or very dissatisfied *vs* 35.0% (7) somewhat or very satisfied, Table 68. Respondents' narrative revealed numerous frustrations: the presenter's lack of subject area knowledge, the material restated old information, too much content and its delivery caused accessibility problems, time lost in presentation when attendees wanted to provide feedback. However, the new information regarding DSA take-up rates and plans was welcomed.

Table 68: How satisfied were you with the content of the presentation about Disabled Students' Allowances? n=20			
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**
10.0% (2)	25.0% (5)	45.0% (9)	20.0% (4)

5.6.4. How satisfied were you with the content of the presentations about the NMH Registration/Audit Process Overview and Audit Outcomes (Both given by Jim Kersse, DSA-QAG Operations Manager)?

The balance of response was again negative, 65.0% (13) being somewhat or very dissatisfied against 35.0% (7) somewhat or very satisfied, Table 69. Narrative comments revealed respondents' frustrations: their feeling that a briefing prior to the audit process would have been more useful than subsequently, the presenter's inadequate understanding of NMH delivery processes, more brevity would have allowed longer Q&A time. Delivery and slide format were noted as clear.

Table 69: How satisfied were you with the content of the presentations about the NMH Registration/Audit Process Overview and Audit Outcomes? n=20			
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**
10.0% (2)	25.0% (5)	40.0% (8)	25.0% (5)

5.6.5. How satisfied were you with the contents of the presentation on the Audit Process Stages (Given by Stuart Allen, DSA-QAG Compliance Officer - Internal)?

The balance of response was negative with 60.0% (12) either somewhat or very dissatisfied however, 40.0% (8) were somewhat or very satisfied, Table 70. Narrative comments again identified a speaker's apparent lack of subject area knowledge, that a briefing before the audit process commenced would have been more useful than subsequently and insufficient detail. Respondents sympathised with the speaker's position, new in role, but were unhappy with his attributing blame for audit delays as due to those being audited.

Table 70: How satisfied were you with the contents of the presentation on the Audit Process Stages? n=20			
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**
10.0% (2)	30.0% (6)	40.0% (8)	20.0% (4)

5.6.6. Thinking of the Q&A session, how satisfied were you with the answers the panellists gave to the audience's questions?

Again, the balance of responses was negative, with 65.0% (13) somewhat or very dissatisfied, Table 71. Narrative comments showed significant frustration with insufficient time allocated to Q&As, answers' lacking content, speakers' apparent lack of sector knowledge and perceived abrogation and shifting of responsibility between the speakers on behalf of their respective organisations.

Table 71: Thinking of the Q&A session, how satisfied were you with the answers the panellists gave to the audience's questions? n=20			
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**
5.0% (1)	30.0% (6)	35.0% (7)	30.0% (6)

5.6.7.   Thinking of the presentation section of the meeting, was it too long, about right or too short?

The majority of respondents, 60.0% (12) felt that the presentation sections' duration was correct, but a significant minority felt it too long, 30% (6); just 10% (2) felt it was too short, Table 72. Narrative comments reflected respondents' frustrations with straightforward organisational issues such as venues' insufficient size and inaccessibility, as well as with insufficient time for Q&A. Comments revealed a mismatch between DSA-QAG's intent to feedback regarding the audit process, and respondents' intent to air their views generally about DSA-QAG and the QAF. Respondents felt that DSA-QAG's lack of understanding of these basic elements reflected its deeper misunderstanding of the daily 'reality' of delivery of NMH support.

Table 72: Was the presentation section too long, just right or too short? n=20		
Too long	**Just right**	**Too short**
30.0% (6)	60.0% (12)	10.0% (2)

5.6.8.   Thinking of the balance of time between the four speakers, was this good, fair, poor or do you hold no view?

The majority 65.0% (13) felt the time allocation between the speakers was fair whilst 35% (7) held no view. The narrative comments repeated that some attendees found little of value in the presentations.

5.6.9.   Thinking of the management of the question and answer section, how satisfied were you?

The balance of dissatisfied respondents significantly outweighed the satisfied by 70.0% (14) to 30.0% (6) respectively, Table 73. Reasons for negativity were: poor time and floor management, a perceived attempt to muzzle questions at one venue by calling for an extended break and attempt to finish the meeting early, and one panel member leaving early for what was perceived as a weak reason. Comments revealed frustration, anger and hostility.

Table 73: Thinking of the management of the question and answer section, how satisfied were you? n=20			
Very satisfied	**Somewhat satisfied**	**Somewhat dissatisfied**	**Very dissatisfied**
10.0% (2)	20.0% (4)	45.0% (9)	25.0% (5)

5.6.10.   Overall, how satisfied were you with the Roadshow?

In addition to the quantitative part of this questions, the narrative question asked what respondents found most and least useful, with the idea of offering guidance back to DSA-QAG for future roadshows.

Of the 55.0% (11) who indicated some degree of satisfaction, moderate satisfaction was the most popular response with only 15.0% (3) stating extremely or very satisfied, Table 74. However, 45% (9) declared themselves as not satisfied.

Table 74: Overall, how satisfied were you with the Roadshow? n=20				
Extremely satisfied	Very satisfied	Moderately satisfied	Slightly satisfied	Not satisfied
5.0% (1)	10.0% (2)	25.0% (5)	15.0% (3)	45.0% (9)

The 'most useful' themes included the opportunity to learn other NMH providers' views and experiences, hear observations about the audit process and improvements to it, meeting representatives of the principal organisations in person and the opportunity to put questions to them. However, there was a feeling that the content was 'spin' – material to emphasise the most positive aspects of the situation (Oxford Learner's Dictionaries, n.d.).

The main and recurring 'least useful' theme was that presenters mis-judged the audience's level of knowledge, offering information which was too basic, already known or of historical interest only.

Respondents provided suggestions for matters they would have liked covered or covered in more detail eg:
1. The need for more flexibility in the way DSA-QAG addressed the sector eg by better understanding of the nature of day-to-day NMH support,
2. The audit process itself and ways it could be better navigated by NMH providers,
3. Greater clarity on the tangible benefits for disabled students of the processes,
4. Clearer communication of the roles and integration between the principal parties of DSA-QAG, DfE, SFE, SLC.

5.6.11.   Triangulation with DSA-QAG's Post-event Circulated Q&A Sheet

Post-event and after its own feedback survey closed, DSA-QAG circulated a "Q&A sheet" which captured participants' points by topic, organisation, response and action for one or more of the principal parties (DSA-QAG, 2017i).

The Q&A sheet's content reflected the key points of frustration raised by this Study's respondents and hence provides a confirmatory triangulation:
1. Loss of business by smaller providers, business concentration in larger providers,
2. Poor working of the 'market' in NMH provision, including loss of ability of students to select a supplier,

3. Difficulty of working with multiple principle parties, DSA-QAG, SFE, SLC, DfE,

4. Complex and inadequately understood audit processes and interpretations,

5. Complex processes for students to understand and master to access support,

6. Insufficient data availability for NMH providers regarding work which is referred but not necessarily notified to them during the award of DSA process, see Appendix 3, S.9,

7. Issues with provision of appropriate NMH tutorial locations,

8. Insufficient clarity in the QAF's role descriptors,

9. Frustration at DFE's requirement for NMH support workers to hold mandatory formal qualifications without acknowledgement of prior practice.

The Q&A sheet documented 89 separate issues, open items were allocated to specific parties, however, without 'action by' dates. No subsequent versions, showing progress, were circulated. The sector was unable to see their concerns being addressed, reinforcing the frustration evident in the meetings and responses to this Study.

5.6.12. Summary & Discussion

Respondents welcomed and had an appetite to meet and potentially develop empathy with the representatives of DSA-QAG, DfE, SFE and SLC. However, there was considerable dissatisfaction, indeed anger, at the meeting's substantive elements. Respondents felt speakers possessed insufficient sectoral understanding, lacked clarity in numerous statements and answers, and resorted to 'buck-passing' between their respective organisations. Respondents felt that briefings prior to the QAF, and audit implementations would have been more useful than just subsequently. Additionally, expectations were mismatched, DSA-QAG wanted to feedback about the audit process whilst respondents also wanted to air a wider range of issues.

Meeting management was also criticised: inappropriate venue, the pace being too fast/not accessible, no planned breaks, insufficient time for questions with one meeting's Q&A truncated, not all the panel sessions were attended throughout by all speakers for, as viewed by the attendees, weak reasons.

Whilst there appeared to be significant dissatisfaction with the roadshows, respondents gave useful suggestions regarding potential future content. However, none was held up to DSA-QAG's December 2019 closure. Even though DSA-QAG may have been unhappy with this Study's survey being conducted, see S.4.4.6, it seems it may have missed the opportunity to respond to respondents' dissatisfactions by offering more frequent open events where views could be exchanged and, by providing additional transparent opportunities for discussion, in a less charged atmosphere.

5.7.   Studies 7-10: Assessing the extent of inclusive teaching in English HEPs

5.7.1.   Analytical model

The Freedom of Information Requests (FOIRs) generated rich information. To provide an accessible narrative in which to place academics' roles in inclusive teaching, this analysis borrows a model from the world of crime fiction, see S.1, which is concerned with discovering who might possess the Motive, Means and Opportunity to commit 'the deed' (The Oxford Companion to Crime and Mystery Writing, 2005). In the 'real world' of criminal law determining intent is also vital to proceedings, "Intent shows the presence of will in the act which consummates a crime" (Black's Law Dictionary Free, n.d.). This analysis however, rather than examining academics' intent looks at HEPs' institutional intent to embrace inclusivity as that intent would likely, in turn, influence their academics' intent, although this is a speculative connection. This crime fiction model contextualises the data, allowing an exposition of the issues; the question being, "To what extent might academics possess the Motive, Means and Opportunity to deliver inclusive teaching?"

5.7.2.   Structural framework

Each FOIR requested information in a logical sequence given their individual purpose. However, in using the analytical model, responses are used as appropriate to each of the subsections within the analysis, Motive, Means and Opportunity. Table 75 provides the cross references between the questions and where the responses are used to create the structural framework. The FOIRs are shown in full in S.18, Appendix 12, and the relevant specific questions which drive the narrative below are shown in the run of text. For reference, FOIRs1 and 2 were sent to all 133 English HEPs, receiving 131 and 132 response respectively. FOIRs3 and 4 were sent to the Higher Education Funding Council for England (HEFCE)/Office for Fair Access (OFFA) and OfS respectively, their responses provided data on all 133 English HEPs. Note, also, that HESA collected whole-UK data, those used here represent English HEPs, unless otherwise stated.

Table 75: How the subsections Motive, Means and Opportunity use the FOIRs' data See S.18, Appendix 12 for the FOIR questions			
Subsection	**FOIR no**	**Question no.**	**Question (paraphrased, see S.18 for full text)**
S.5.7.3 Motive	FOIR2	A.2a	How is training in inclusive teaching delivered?
	FOIR2	A.2e	How is training in inclusive teaching tracked?
S.5.7.4 Means	FOIR2	A.1	How does your HEP define inclusive teaching?
	FOIR2	A.2b	How much training in inclusive teaching is offered?
	FOIR2	A.2c	What % of academic staff has currently received this training?
	FOIR2	A.2d	What % of academic staff receive this training annually?
	FOIR2	A.2f	Does the training explicitly include teaching students with SpLDs? And if so, what are the learning objectives of the relevant modules?
S.5.7.5 Opportunity	FOIR1	1	How is the Disability Premium received by your HEP used and what are the aims, timescales, metrics and outcomes of that usage?
	FOIR2	B.1a	What percentage of your courses have so far been so validated/revalidated [against inclusive teaching criteria]?
	FOIR2	B.1b	By what date you expect to have all your courses so validated/revalidated?
	FOIR2	B.1c	What are the key validation/revalidation criteria relating to inclusive teaching in general and for students with SpLDs in particular?
	FOIRs3 and 4	1	What does each English HEP spend on improvement of inclusivity in teaching and learning as part of its student success expenditure for support for disabled students.

5.7.3.   Motive – "causing motion…the initiation of action"

(Chambers Dictionary, 1998)

This section presents results from FOIR2, triangulating these against HESA statistics and Williams et al. (2019) to reveal a lack of Motivation to teach inclusively. Potential reasons are then suggested for this lack in the context of ministerial statements, Appendix 1, S.7, the DSSLG report (DSSLG, 2017) and the TEF.

What Motive do academics have to teach inclusively? Whilst it is difficult to impute peoples' motives, this analysis considers that people's motives are either of the 'stick' or 'carrot' variety, potentially deriving from either their HEP employers' requiring them to teach inclusively or personal motives due to other reasons, eg personal advancement, 'feel good' or altruism. Irrespective of whether motives might be 'stick' or 'carrot', were HEPs to require or take account of their staff's inclusive teaching they may wish to record and monitor relevant data and act upon it. The following examines the extent to which these three actions might occur.

5.7.3.1.   "Stick" and "carrot" motivation

FOIR2 generated a dataset which suggested both 'stick' and 'carrot' were at work to motivate academics to gain a teaching qualification, which typically was based upon and worked towards the HEA Fellowship Scheme (HEA/Advance HE, n.d.). FOIR2 asked, "Does your HEP offer training in inclusive teaching to its academic staff?" It did not ask about a general teaching qualification however, many respondents in answering FOIR2's specific questions also answered in the context of their general training for academics.

62.8% (83) of responding HEPs offered formal in-house PG Certificates in HE (PGCHE), or similarly named qualifications, 25.0% (33) expected academics to follow some CPD activities to gain a teaching qualification whilst 9.1% (12) offered no training, Table 76.

Table 76: Type of training available in inclusive teaching. n=132			
Formal in-house Post Graduate Certificate	Informal CPD activities	None offered	No answer given
62.8% (83)	25.0% (33)	9.1% (12)	3.0% (4)

For most HEPs in the first two categories, new academics had to gain a teaching qualification eg PGCHE, to transition from probationary to established status, which would qualify as a 'stick' motivation. In their responses, HEPs assumed their PGCHEs provided training in inclusive teaching, see below Means and Opportunity, S.0 and S.5.7.5. However, for existing staff, 69.7% (92) of HEPs responded that their staff learned about inclusive teaching through CPD whilst 9.8% (13) said that they did not offer training to existing staff and 30.3% (40) did not mention how existing staff received training in inclusive teaching. These latter two categories of HEPs gave no indication regarding how existing academics could or should become inclusive teaching qualified. Hence one might suggest, in the absence of employer insistence, that only a 'carrot' approach applied to these existing staff, they would need to be self-motivated to follow a training course in academic practice and/or inclusive teaching.

Regarding tracking of academics' training, FOIR2 asked, "How do you track this training for each academic?" Only 23.5% (31) said that they tracked academics' training through centrally held and administered records, a further 31.8% (42) held the information only within individuals' HR records. Approximately half of these 73 respondents indicated that obtaining data on who had been trained was relatively straightforward, the other half expressed difficulties; 4.5% (6) claimed partial exemption from providing data on cost grounds, strongly suggesting that the data was not easily available (Freedom of Information Act, S12, 2000), Table 77. These data suggest that there may have been a sector-wide problem with tracking training.

Table 77: How do you track this training for each academic? n=132				Of the 73 providing data
Training tracked through centrally held and administered records	Training tracked through individuals' training records	Exemption from providing data due to cost/time grounds	No answer given	The data was relatively straightforward to obtain
23.5% (31)	31.8% (42)	4.5% (6)	40.0% (53)	49.3% (36 of 73)

Some HEPs commented that training was distributed across academic departments/schools implying that consolidating training information was difficult. A small number commented that the record of training was used during staff appraisals.

FOIR2, in identifying the above gaps in training, might have revealed an element of either disinterest in or ignorance of what might comprise inclusive practices. In a useful triangulation, Williams et al. (2019, p. 44) identified that only 39.4% of HEP respondents (n=66) thought that a definition of 'inclusive practice' should include teaching and learning and only 40.9% that it include curriculum and assessment. Usefully, one HEP succinctly encapsulated training's importance (Williams, et al., 2019, p. 50):

> "We are asking them to work differently, which can be uncomfortable, particularly if they haven't ever been taught how to design a programme, what assessments can link to learning outcomes and how to offer accessible materials"

In summary, FOIR2 identified some 'stick' motivation which required new staff to gain a qualification as a condition of their established employment. Contrastingly, there was no similar 'stick' motivation for existing staff. However, FOIR2 identified one 'carrot' motivation, namely of teaching qualifications benefitting individuals through their annual appraisals.

5.7.3.2.　　　Higher Education Statistics Agency (HESA): English HEPs' academic staff HE-qualification (Triangulation)

HESA published data regarding academic staff known to hold and known not to hold an HE-teaching qualification plus those whose teaching qualification status is unknown (HESA, 2019a). The data presented below includes all academics, irrespective of contract duration/type who solely taught or who combined teaching with research, thereby capturing all academics with teaching contact with students. The HESA data did not differentiate between new or existing academics.

Table 78 and Figure 26 show the progression in these data, in tabular and graphical format respectively, for all English HEPs between AY2014/15-AY2017/18. Over four years, academic teaching numbers grew by 7.8%. Four-year growth in those holding an HE teaching qualification was 28.2% and in those not holding an HE-teaching qualification 20.3%; contrastingly, numbers whose HE-teaching qualification status was unknown dropped by 42.5%. Whilst these data indicate movement in the direction of increased numbers with an HE-teaching qualification, numbers of those not holding a qualification also grew and that, despite a significant fall, there still existed a significant minority of unknown status. Hence, these data confirm FOIR2's results that significant gaps exist in the universality of HE-trained academics and that a sector-wide problem existed in tracking academic staff qualifications.

Table 78: English HEPs' academic staff qualifications AY2014/15-AY2017/18 (tabular format) (HESA, 2019a)					
Academic Year	Qualification held	Qualification not held	Unknown	Total	Reporting HEPs
2014/15	47.1% (59,285)	26.3% (33,160)	26.6% (34,455)	100% (125,900)	132
2015/16	50.8% (65,405)	28.6% (36,875)	20.6% (26,495)	100% (128,775)	132
2016/17	54.2% (72,245)	28.5% (37,985)	17.3% (23,025)	100% (133,255)	133
2017/18	56.2% (76,025)	29.4% (39,880)	14.6% (19,820)	100% (135,720)	134
Overall change	28.2%	20.3%	-42.5%	7.8%	
Annual change	7.1%	5.1%	-10.6%	2.%	

Figure 26: Academic staff qualifications in English HEPs AY2014/15-AY2016/17 (graphical format) (HESA, 2019a)
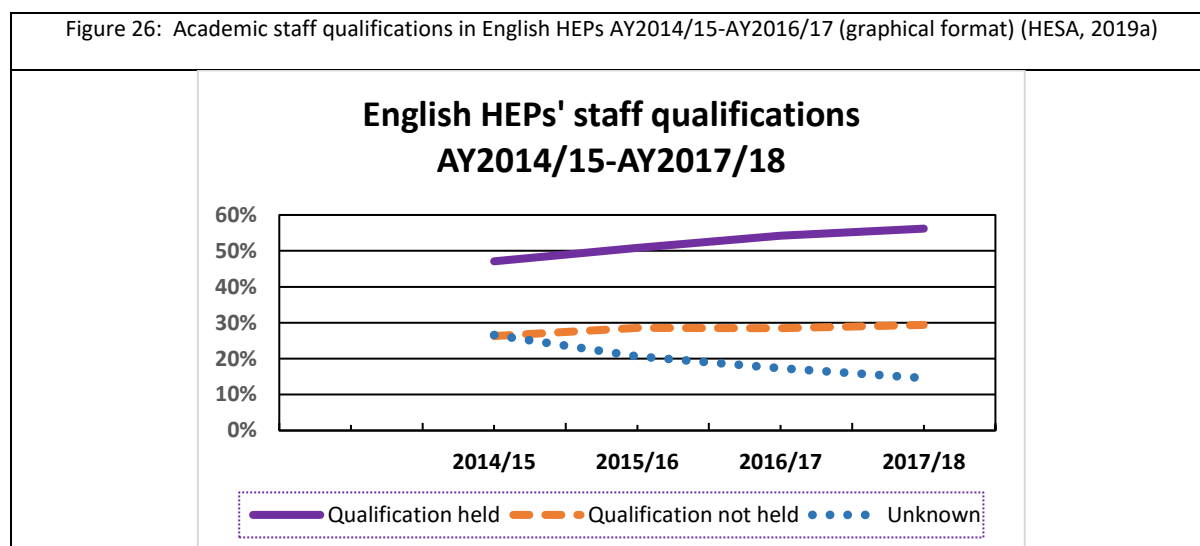
Variation in HEPs' performance in their staff's qualification status

Further analysis of HESA's data shows a wide variation in individual HEPs' knowledge about their academics' HE-teaching qualifications. The analysis, below, refers to the latest year available, AY2017/18, with comparisons to the prior year regarding changes, presenting overall data as histograms followed by tabular data showing HEPs' individual performance, with narrative interspersed. Figure 27 shows that 29.1% (39 of 134) of HEPs had <50% of staff who were known to have an HE-teaching qualification (identified by solid orange and mauve diagonal lines patterns), whilst only 15.7% (21) HEPs had >75% of staff who were known to have an HE teaching qualification (identified by green bumps pattern). The distribution varied little from AY2016/17.

Figure 27: Analysis of English HEPs reporting % academic staff holding a teaching qualification AY2017/18 (HESA, 2019a).
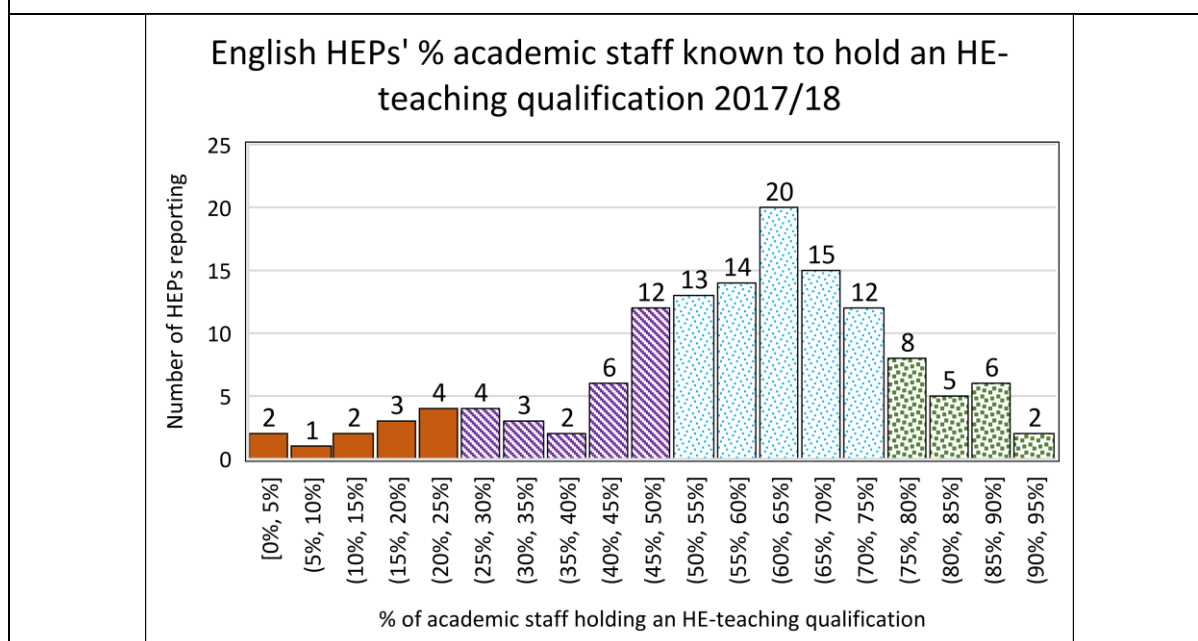
Table 79 shows that in 15.7% (21 of 134)[36] reporting institutions >75% of staff held an HE-teaching qualification (identified by the green bumps pattern in Figure 27). Interestingly, with just one exception these HEPs were post-1992 institutions (HEPs' own websites); (OfS, 2018a); (UWN, 2013).

HE Provider Date of foundation as universities or date of being granted degree awarding powers (HEPs' websites); (OfS, 2018a); (UWN, 2013)	Teaching qualification held	No teaching qualification held	Not known	Total (includes rounding errors)
The University of Huddersfield (1992)	93.5%	5.8%	0.6%	100.0%
University of Chester (2005)	91.7%	7.4%	0.0%	99.2%
Bishop Grosseteste University (2006)	90.0%	10.0%	0.0%	100.0%
York St John University (2006)	89.7%	10.3%	0.0%	100.0%
University of St Mark and St John (2007)	87.5%	6.3%	6.3%	100.0%
University of Bedfordshire (1993)	86.2%	9.2%	3.7%	99.1%
University College Birmingham (2012)	85.7%	12.5%	0.0%	98.2%
Harper Adams University (2012)	85.3%	14.7%	2.9%	102.9%
Edge Hill University (2006)	84.3%	15.7%	0.0%	100.0%
University of Plymouth (1992)	83.6%	14.2%	2.3%	100.0%
The University of Wolverhampton (1992)	82.2%	17.8%	0.0%	100.0%
Teesside University (1992)	82.0%	17.3%	0.0%	99.2%
Middlesex University (1993)	80.3%	17.2%	2.5%	100.0%
Leeds Trinity University (2012)	80.0%	17.1%	2.9%	100.0%
Canterbury Christ Church University (1995)	78.8%	21.9%	0.0%	100.7%
University of Cumbria (2007)	78.0%	22.0%	0.0%	100.0%
The University of Leicester (1958)	77.0%	23.4%	0.0%	100.4%
Roehampton University (2004)	76.3%	5.1%	18.6%	100.0%

Table 79: English HEPs reporting that >75% of academics known to hold a teaching qualification AY2017/18 (HESA, 2019a)

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[36] HESA's list of HEPs included two institutions which were not HEPs but offered HE qualifications through associate HEPs. The list used to distribute FOIRs1 and 2 did not include these two institutions.

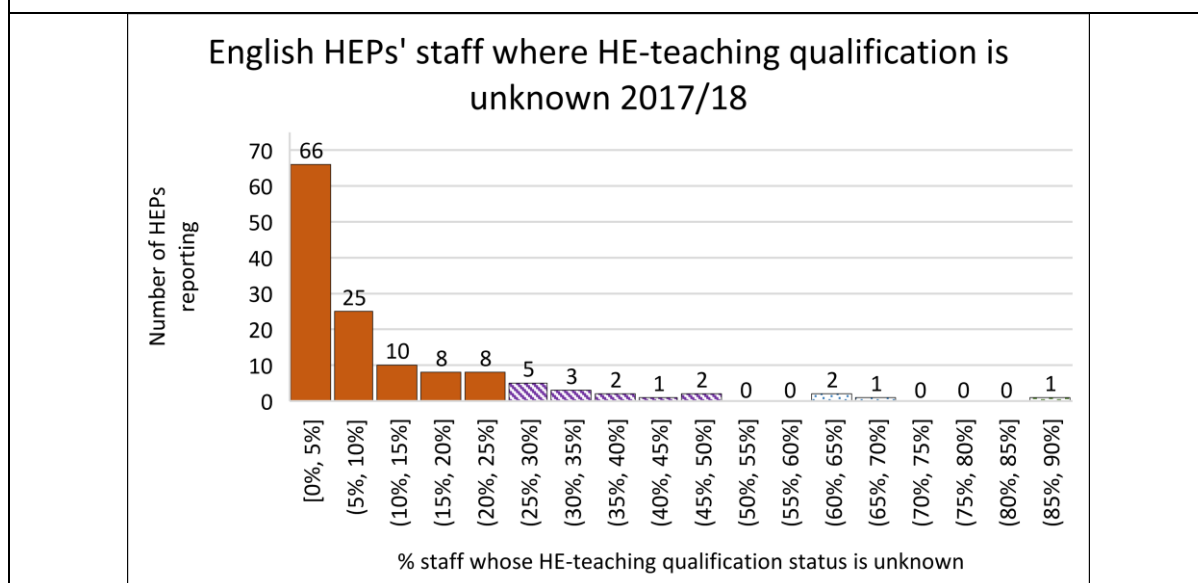| Table 79: English HEPs reporting that >75% of academics known to hold a teaching qualification AY2017/18 (HESA, 2019a)				
HE Provider **Date of foundation as universities or date of being granted degree awarding powers** (HEPs' websites); (OfS, 2018a); (UWN, 2013)	**Teaching qualification held**	**No teaching qualification held**	**Not known**	**Total (includes rounding errors)**
The University of Bolton (2005)	75.8%	24.2%	0.0%	100.0%
Anglia Ruskin University (1992)	75.4%	25.1%	0.0%	100.6%
Sheffield Hallam University (1992)	75.2%	17.4%	7.4%	100.0%

Contrastingly, Table 80, shows the 9.0% (12 of 134) of HEPs where <25% academics were known to hold an HE-teaching qualification (identified by solid orange and solid mauve lines patterns in Figure 27)[37]. With the exception of the University of London Institutes & Activities, which solely offered international distance learning courses and for which no founding information was available, and the post-graduate London Business School, all HEPs were pre-1992 (HEPs' own websites); (OfS, 2018a); (UWN, 2013).

Table 80: English HEPs reporting that <25% of academics were known to hold a teaching qualification AY2017/18 (HESA, 2019a)				
HE Provider **Date of foundation as universities or date of being granted degree awarding powers** (HEPs' websites); (OfS, 2018a); (UWN, 2013)	**Teaching qualification held**	**No teaching qualification held**	**Not known**	**Total (includes rounding errors)**
London Business School (1986 – founded & degree awarding powers)	0.0%	100.0%	0.0%	100.0%
Royal Academy of Music (1822 – founded but not as university)	8.6%	84.5%	6.9%	100.0%
London School of Economics and Political Science (1895 founded but not as university)	12.6%	0.0%	87.0%	99.6%
Courtauld Institute of Art (1930 – founded but not as university)	14.3%	85.7%	0.0%	100.0%
The University of Cambridge (11th century)	16.0%	22.0%	62.0%	100.0%
University of London (Institutes and activities) (No information available)	16.7%	58.3%	25.0%	100.0%
SOAS University of London (1916 - founded but not as university)	18.4%	14.6%	67.1%	100.0%
The Institute of Cancer Research (1927 – recognised as centre for postgraduate teaching)	21.4%	64.3%	14.3%	100.0%
The University of Oxford (12th century)	22.7%	30.4%	46.6%	99.7%
Trinity Laban Conservatoire of Music and Dance (Precursor organisations founded 1875 & 1946 as conservatoires, merging in 2005)	23.8%	40.0%	36.3%	100.0%
Royal College of Music (1882 – founded but not as university)	24.6%	71.9%	3.5%	100.0%

Figure 28, shows the distribution where academic staff's HE-teaching qualification was unknown. Some 3.0% (4 of 134) did not know whether an HE-teaching qualification was held by ≥50% of their staff (blue dots and green bumps patterns), 12.7% (17 of 134) were unaware of ≥25% of their staff's teaching qualification (additionally mauve diagonal lines pattern). Just under half of HEPs, 49.3% (66 of 134) had <5% of staff whose qualification was unknown.

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[37] The National Film & Television School (NFTV) has been omitted from this list as its data as published by HESA did not reconcile, showing 0 known to hold, 20 known not to and 0 unknowns but 25 total staff.

Figure 28: English HEPs reporting % academic staff where teaching qualification status was unknown (HESA, 2019a)

Further analysis in Table 81, shows the 3.0% (4 of 134) which reported that they did not know the teaching qualification of >50% of their staff were 'venerable' institutions whose foundation significantly predated 1992. Nevertheless, these data represent an improved position over AY2016/17 when 4.5% (6) HEPs did not know the HE-teaching qualification status of >50% of their academics.

HE Provider Date of foundation as universities or date of being granted degree awarding powers (HEPs' websites); (OfS, 2018a); (UWN, 2013)	Teaching qualification held	No teaching qualification held	Not known	Total (includes rounding errors)
London School of Economics and Political Science (1895 foundation but not as university)	12.6%	0.0%	87.0%	99.6%
SOAS University of London (1916 - foundation but not as university)	18.42%	14.6%	67.1%	100%
The University of Cambridge (11th century)	16.0%	22.0%	62.0%	100%
University College London (1826)	29.3%	10.2%	60.5%	100%

Table 81: English HEPs reporting that >50% of academic staff whose teaching qualification was unknown (HESA, 2019a)

Conversely, Table 82 shows the 22.4% (30 of 134) of HEPs reporting 0% of academics whose teaching qualification was unknown, 23 of which are post-1992 institutions[38].

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[38] Six HEPs have been omitted from this list as their data as published by HESA did not reconcile, showing greater than 3% rounding error: AECC University College, NFTV, Heythrop College, Newman University, Plymouth College of Art, Royal Agricultural University.

Table 82: English HEPs reporting no academic staff whose teaching qualification is unknown (HESA, 2019a)				
HE Provider **Date of foundation as universities or date of being granted degree awarding powers** (HEPs' websites); (OfS, 2018a)	**Teaching qualification held**	**No teaching qualification held**	**Not known**	**Total (includes rounding errors)**
Anglia Ruskin University (1992)	75.4%	25.1%	0.0%	101%
Birkbeck College (1823 founded, 1920 became part of London University)	46.2%	53.8%	0.0%	100%
University College Birmingham (2007)	85.7%	12.5%	0.0%	98%
Bishop Grosseteste University (2006)	90.0%	10.0%	0.0%	100%
The University of Bolton (1995)	75.8%	24.2%	0.0%	100%
The Arts University Bournemouth (2008)	48.0%	52.0%	0.0%	100%
Bournemouth University (1992)	73.4%	26.6%	0.0%	100%
The University of Bristol (1909)	45.0%	55.0%	0.0%	100%
Canterbury Christ Church University (1995)	78.8%	21.9%	0.0%	101%
University of Chester (2007)	91.7%	7.4%	0.0%	99%
Courtauld Institute of Art (1930)	14.3%	85.7%	0.0%	100%
University of Cumbria (2007)	78.0%	22.0%	0.0%	100%
Edge Hill University (2007)	84.3%	15.7%	0.0%	100%
Guildhall School of Music and Drama (1880)	25.4%	74.6%	0.0%	100%
Leeds Arts University (2016)	71.0%	29.0%	0.0%	100%
The University of Leicester (1958)	77.0%	23.4%	0.0%	100%
Liverpool Hope University (2009)	75.0%	25.0%	0.0%	100%
The Liverpool Institute for Performing Arts (1995)	62.5%	37.5%	0.0%	100%
Liverpool School of Tropical Medicine (1898)	70.6%	35.3%	0.0%	106%
London Business School (1986 – founded but not as a university)	0.0%	100.0%	0.0%	100%
The University of Northampton (2005)	54.0%	45.4%	0.0%	99%
Norwich University of the Arts (2007)	62.5%	37.5%	0.0%	100%
The Royal Central School of Speech and Drama (2004)	57.1%	42.9%	0.0%	100%
Solent University (2017)	74.6%	26.1%	0.0%	101%
Staffordshire University (1992)	56.3%	44.3%	0.0%	101%
The University of Surrey (1996)	59.7%	40.3%	0.0%	100%
Teesside University (1992)	82.0%	17.3%	0.0%	99%
The University of Wolverhampton (1992)	82.2%	17.8%	0.0%	100%
Writtle University College (2016)	71.4%	28.6%	0.0%	100%
York St John University (2015)	89.7%	10.3%	0.0%	100%

Triangulation summary

The above analysis of HESA data shows significant variation across the sector in both numbers of HE-trained academic staff and in recording that training. They confirm FOIR2's findings that there existed significant gaps in training HE academic staff and an apparent sector-wide tracking issue revealed by the significant size of the qualification 'not known' category. Additionally, pre-1992 HEPs performed worse than post-1992 across all three categories of trained, known to be untrained or unknown training status.

However, these HESA data relate only to academics holding a general HE-teaching qualification, they do not reveal how many academics might have received training in inclusive teaching, which do not exist in the public domain. Nevertheless, as training in inclusive teaching would likely be a subset of general HE teaching training, the data could be regarded as a 'best case' for inclusive teaching.

In a further triangulation, which confirms that gaps in training are recognised by HEPs, Williams et al. (2019, pp. 92-99) reported that the percentages of HEPs giving academic staff disability training was, Table 83:

Table 83: Percentage of HEPs giving disability training to their staff Williams et al. (2019, pp. 92-99) n=76 [Original rounded to nearest percentage whole number]				
All staff 100%	**Vast majority of staff 79-99%**	**Majority of staff 50-74%**	**Minority of staff 25-49**	**Small minority <25%**
49% (37)	7% (5)	14% (11)	9% (7)	21% (16)

48% reported that such training was voluntary, 8% compulsory and 44% a mix. Content was reported as general disability training by 7%, specific issues 2% and a mixture by 91%, which strongly suggests that individual Equity Groups' needs, their specific issues, were not fully communicated. Nearly half provided disability training less than annually.

5.7.3.3.   *Potential reasons for lack of motivation to teach inclusively*

Academic staff's apparent lack of Motivation to teach inclusively might at first sight seem surprising. However, institutional environments might have been unconducive, their HEPs' might have lacked intent regarding inclusive practices, inclusive teaching amongst them. Hence the next section examines four potential sources of institutional intent: the changes in DSAs, DSSLG's sector led report, OFFA's Access Agreements regime and the TEF.

Ministerial announcements about the Modernisation of DSAs

Willetts' Modernisation announcement stated that HEPs were expected to give "greater consideration to the delivery of their courses" so that "some individual non-medical help (NMH) may be removed through different ways of delivering courses and information" (BIS, 2014e); see Appendix 1, S.7. However, in a subsequent policy statement Johnson confirmed that Willett's original proposals' scope was significantly reduced and that DSAs, albeit with fewer support 'Bands', would essentially remain unchanged (BIS, 2015c). He, perhaps wryly, observed that "[continued availability of DSAs] may have removed the urgency of some HE providers to expand provision for all disabled students". In this research analysis, 'removed urgency' may explain reduced institutional "intent".

Johnson, however, offered something of a plea, "I believe HE providers share my ambition for the development of more inclusive learning environments" and that he and his Department were "looking into how it can encourage a sector-led approach to the sharing of good practices in the lead up to the changes and as they bed in" (BIS, 2015c); Appendix 1, S.7.

DSSLG report

This 'sector-led approach' resulted in DSSLG's formation and its report *Inclusive Teaching and Learning in Higher Education as a Route to Excellence* (DSSLG, 2017), which envisaged that "[d]eveloping inclusive and accessible learning practices can only be successfully

embedded if seen as an evolving journey at a national, organisational and professional level" (Draffan, et al., 2018).

To what extent might DSSLG's report have encouraged HEPs to require their academic staff to embrace and deliver inclusive teaching practices? Draffan et al. (2018) noted that differing "inclusive teaching and learning practices" were used in different UK devolved regions and disciplines, together with there being a need for "an accepted model of what inclusive teaching and learning practices comprise for disabled students". Their commentary concluded *inter alia*, "there remains a need to develop a long term plan to support the sector in developing the necessary tools and skills to embed these inclusive practices within the academic and teaching staff communities" (Draffan, et al., 2018, pp. 2, 3, 9 resp). Draffan et al. clearly saw shortcomings in the DSSLG report as regards offering an approach which would allow HEPs to operationalise inclusive teaching, despite the report's aspirational title.

Additionally, the report proposed neither incentives nor sanctions, nor was DSSLG able to follow through with further sector actions, possibly due to its remit being limited to offering "guidance" and "shar[ing] suggestions" (DSSLG, 2017)[39]. The next section examines the potential OFFA's Access Agreements had for incentivising HEPs to embrace inclusive teaching.

Office for Fair Access (OFFA) and Access Agreements

OFFA was created in 2004 to, *inter alia*, ensure that "universities [HEPs]…were explicitly committed to increasing participation in higher education among under-represented groups" (OFFA, 2018b), its *modus operandi* was to:

> "[E]ncourage change…by approving and monitoring access agreements – annually submitted documents in which universities…set out…tuition fees and how they plan to improve/sustain access, success and progression for people from under-represented and disadvantaged groups [widening participation]. All publicly funded universities…in England must have an [approved] Access Agreement…in order…to charge higher tuition fees".

HEPs failing their Access Agreements' commitments were subject to OFFA's sanctions including removing permission to charge higher tuition fees and imposing fines by withholding HEFCE monies. However, the media reported:

> "OFFA has never punished a university for failing to meet its access targets since it was established in 2004. For the year 2008-09, the most recent figures available, 26 institutions did not meet the aims of their access agreements. In theory OFFA could

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[39] In June 2019, Universities' Minister Chris Skidmore announced that the OfS would develop a Commission for Disabled Students, "The Commission, formerly Disabled Students' Sector Leadership Group (DSSLG), will use the DSSLG's existing guidance for providers on supporting disabled students inclusively and look at what more needs to be done" https://www.gov.uk/government/news/new-group-to-boost-support-for-disabled-students

have punished them with fines of up to £500,000 but not one was handed out" (The Independent, 2011).

By 2016, "The agreements published by OFFA show that almost every university has been given permission to set a new maximum [tuition fee] of £9,250 from 2017" (BBC, 2016), removing a key 'lever' in influencing HEPs' intent to achieve their access agreement goals. OFFA reported no major access agreement breaches between 2012-2017, none related to failure to deliver widening participation goals (OFFA, 2017a). On the evidence, OFFA's regime lacked teeth giving HEPs little incentive to fully develop their intent to embrace inclusivity.

In contrast to the absence of major breaches of OFFA's access agreements between, OfS, which assumed responsibility for access agreements (renamed Access and Participation plans) from March 2018, reported two in its first year, fines totalled £316k. OfS had "…much stronger powers to punish breaches of access agreements…than its predecessor in this area [OFFA]" (THE, 2018).

OfS's approach also needed strengthening *vs* OFFA regarding what it expected access agreements to address. OFFA's strategic guidance to HEPs for AY2018/19 asked in Paras 49-53 that they (OFFA, 2017b):

> "[set] specific targets relating to mental health issues, specific learning difficulties and/or students on the autistic spectrum", "build on…work [they] are already doing to promote access, success and progression for disabled students, and to ensure students receive accurate information about the support they can expect to receive" and "[i]n developing your plans to support disabled students, you may find it useful to refer to…good practice guidance on inclusive teaching and learning in higher education published by the Disabled Student Sector Leadership Group".

This strategic guidance is unchallenging, the more so by referring to a report which itself merely offers "guidance", neither providing concrete recommendations to operationalise inclusive teaching nor defining objectives against which to assess progress. A cynic might argue that if all OFFA's advice were as ineffective then it is unsurprising that HEPs' access agreements passed its standards. Whether the OfS's newly styled Access and Participation Agreements with their focus on "outcomes rather than means, continuing year-on-year progress, greater degree of scrutiny, risk-based assessment and greater autonomy for HEPs", will ultimately succeed in achieving higher levels of inclusive teaching remains to be seen (OfS, 2018d).

The next section considers the contribution the TEF might have in developing HEPs' intent to implement inclusive teaching.

The Teaching Excellence Framework (TEF)

The UK Government announced the TEF in 2015, with annual results from AY2016/17, and legislated in 2017 (HERA, 2017) with the aims of "[b]etter informing students' choices about what and where to study, [r]aising esteem for teaching, [r]ecognising and rewarding excellent teaching and [b]etter meeting the needs of employers, business, industry and the professions" (DfE, 2017a, p. 7). The TEF drew on "currently available, nationally collected data", and regarding "Teaching Quality/Teaching on my course", the metric comprised questions 1-4 from the National Student Survey (DfE, 2017a, pp. 30-31); (NUS, 2017a):

1. Staff are good at explaining things.
2. Staff have made the subject interesting.
3. The course is intellectually stimulating.
4. My course has challenged me to achieve my best work

However, it is difficult to see how these questions relate either to inclusion in general or inclusive teaching in particular (NUS, 2017a).

Discussion

None of these four policy initiatives gave compelling reasons for HEPs, faced with undoubted other priorities, to embrace inclusive teaching and for this to flow through to a requirement for their staff to deliver it. Nevertheless at least one HEP had developed a framework for driving the implementation of ITL using its ratings in the NSS as a lever, see Appendix 13, S.19.

5.7.3.4.   Motive - section summary

Responses to FOIR2 indicated significant gaps in the numbers of academics trained in inclusive teaching. Triangulation with HESA data confirmed the presence of gaps in the wider general training of academics. Although the 4-year trends appeared to be heading in the 'right' direction, for AY2017/18 across English HE only 56.2% were known to hold an HE-teaching qualification and 29.4% were known not to hold an HE-teaching qualification. Both FOIR2 and HESA data suggest that a tracking problem also existed regarding training qualification status, the status of HE-training received by 14.6% of academics was unknown.

These general and specific gaps in training and the means to report on it suggest HEPs lacked the intent to implement inclusive teaching. Academics in general may also have lacked both "stick" and "carrot" Motivation to gain inclusive teaching qualifications. Neither policy as implemented, a sector-led initiative, sector regulation nor an assessment of teaching excellence appear to have made a material difference to either issue.

5.7.4.   Means – "a way to an end"

This section further examines answers to FOIR2's questions, Table 75, before triangulating them against the ways by which academics might have been enabled to teach inclusively as part of their wider teaching qualification which appears largely based on the HEA/Advance HE Fellowship Scheme (HEA/Advance HE, n.d.).
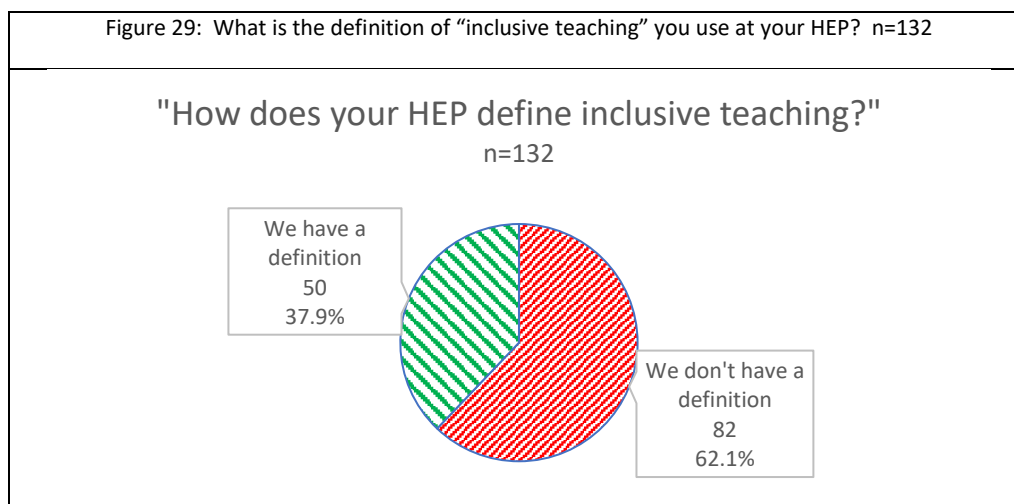
The analysis reveals gaps in academics' Means, potential reasons for which relate to the Quality Assurance Agency's UK Quality Code for HE (QAA, 2012) and its interaction with the UK Professional Services Framework (UKPSF) (HEA/Advance HE, 2011).

This section's discussion is based on the assumption that the knowledge to teach inclusively is something which both has to be learned and "…necessitates a shift away from supporting specific students…towards equity considerations being embedded within all functions…a shift of such magnitude requires cultural and systemic change at both the policy and practice levels" (May & Bridger, 2010). Note that this advice was endorsed by the HEA, appearing as a reference document on its website (HEA/Advance HE, 2015). The discussion examines the evidence for systemic change at the practice level.

5.7.4.1.   Definition of inclusive teaching

The above dictionary definition of Means requires that there is an 'end' which further implies in an academic sense that there should be a definition of that end. FOIR2 therefore asked, "How does your HEP define inclusive teaching?" to which 62.1% (82) replied that their HEP had no definition, Figure 29. Of those which did, 24.0% (12 of 50) and 9.1% of the total used Hockings' or one closely modelled on it:

> "Inclusive learning and teaching in higher education refers to the ways in which pedagogy, curricula and assessment are designed and delivered to engage students in learning that is meaningful, relevant and accessible to all. It embraces a view of the individual and individual difference as the source of diversity that can enrich the lives and learning of others." (Hockings, 2010), see S.3.4.8.

Figure 29: What is the definition of "inclusive teaching" you use at your HEP? n=132

"How does your HEP define inclusive teaching?"
n=132

We have a definition
50
37.9%

We don't have a definition
82
62.1%

For HEPs without of a definition of inclusive teaching, it is hard to see how they could know either at what goals they aimed or their progress thereto. Williams et al. (2019, p. 44) revealed one possible consequence of this definitional absence, Table 84. Their data showed, *inter alia*, that just under half considered that inclusive practice did not involve all their students and well under half that inclusive practice did not involve curriculum assessment, teaching and learning nor physical accessibility.

Table 84: How would you define inclusive practice? (Open-ended, multiple responses coded) (Williams, et al., 2019, p. 44). n=66	
	Number
All student approach	34 (51.5%)
Curriculum and assessment	27 (40.9%)
Teaching and learning	26 (39.4%)
Collaborative approach	13 (19.7%)
Physical accessibility	9 (13.6%)
Social model of disability approach	8 (12.1%)

There appears to be no internationally adopted definition of inclusive teaching. However, Schuelke (2018) identified a definition based on the UN Committee on the Rights of Persons with Disabilities (2016). Additionally, he identified UNESCO's conceptualisation of success in inclusive education (UNESCO, 2017). Neither was mentioned by any of the respondents. The DfE had not adopted its own definition although in its promotion of *Inclusive Teaching & Learning in Higher Education as a Route to Excellence* (DSSLG, 2017) at one remove endorsed Hockings' which was included therein.

Notwithstanding definitional absence and shortcomings, as noted in S.3.2.4 and S.3.2.5 both Williams et al. (2017) and Williams et al. (2019), respectively, asked HEPs to adjudge their progress towards inclusive models.

Draffan et al. (2018, p. 2) identified that there may be pitfalls in defining inclusive teaching learning, such as "the risk of reducing aspirational planning and out of the box thinking" preferring the use of the broad concepts of "inclusive approaches". However, they

identified the necessity for an accepted model of "what ITL comprises for disabled students" (p. 2) and strongly supported the idea of transparency offering "comparable information on approaches to inclusive and teaching and learning…of particular interest to prospective students" (p. 7). They identified that the TEF has no such mechanism although has the potential to so do (p. 6) but it is hard to see how understandable comparability could be achieved without a sector-wide agreed definition.

5.7.4.2.   Training offered in inclusive teaching

Respondents were asked, "How much training in inclusive teaching is offered? (eg hours per course/year)?". Some 45.5% (60) responded with data; 34.1% (45) offered 1-10 hours specific training in inclusive teaching, 6.8% (9) between 11-20 hours, 1.5% (2) between 21-50 hours and 3.0% (4) over 50 hours, Table 85. The balance of respondents answered variously, 15.9% (21) did not track the hours, 25.0% (33) made no mention of hours trained, in 3 cases explicitly because the HEPs possessed no definition of inclusive teaching. A further 13.6% (18) replied that they did not track hours as inclusive teaching training was embedded within other material, Table 85.

Table 85: Hours training in inclusive teaching per academic. n=132						
Hours training 1-10	**Hours training 11-20**	**Hours training 21-50**	**Hours training >50**	**Hours training Not tracked**	**Hours training Not given**	**Hours training not tracked as embedded**
34.1% (45)	6.8% (9)	1.5% (2)	3.0% (4)	15.9% (21)	25.0% (33)	13.6% (18)

Respondents were further asked, "What percentage of academic staff has currently received this training?"

Only 32.6% (43) responded with data; 1.0% (2) had <10% inclusive teaching trained staff, 3.0% (4) had between 11-20% trained whilst 27.3% (36) had >20% of staff so trained, 35.6% (47) gave no information and 32.6% (43) did not track the amount, Table 86.

Table 86: Percentage of total academic staff which has received inclusive teaching training. n=132				
Total trained <10%	**Total trained 11-20%**	**Total trained >20%**	**Total annual hours not given**	**Total annual hours not tracked**
1% (2)	3.0% (4)	27.3% (36)	35.6% (47)	32.6% (43)

In response to the question, "What percentage of total academic staff receives this training annually?" only 30.3% (40) responded with data, for the majority it was not clear whether HEPs were responding about academic training in general or just regarding inclusive teaching although from the context of narrative responses, it seems likely numerous referred to training in general. Nevertheless, this research has erred on the 'generous side' and assumed that all referred to inclusive teaching. The data shows that few staff received annual training in inclusive teaching, possibly mainly new staff undertaking their PGCHEs, or equivalent qualification, rather than existing. However, specifically the 3.8% (5) reporting

100% of staff received annual training mandated attendance and content related to inclusive teaching, Table 87.

Table 87: Total staff trained annually in inclusive teaching. n=132						
Total trained annually 1-5%	Total trained annually 6-10%	Total trained annually 11-20%	Total trained annually 21-99%	Total trained annually 100%	Total trained annually not given	Total trained annually not tracked
9.8% (13)	4.6% (6)	8.3% (11)	4.6% (6)	3.8% (5)	50.8% (67)	18.2% (24)

The final question in FOIR2's series asked, "Does the training explicitly include teaching students with SpLDs? And if so, what are the learning objectives of the relevant modules?"

This question focused on SpLDs due to their prevalence. As mentioned in S.3.2.2, SpLDs were the most frequent self-reported disability for all levels of English HE students in AY2017/18 at 38% and 5.2% of undergraduates and dyslexia was the most frequent diagnosis of an SpLD resulting in the award of DSA, however, public domain annual data for dyslexia prevalence were available only upon special request (Williams, et al., 2017, p. 24) (Williams, et al., 2019, p. 7); (HESA, 2019b); (HESA, 2020). The further logic behind the question lay in how this largest Equity Group's needs were addressed might be indicative of other disabled students' needs being met.

Learning objectives and outcomes were defined as (HEA/Advance HE, n.d.):

> "The skills and knowledge that a student should possess on successful completion of a course of study. The terms 'learning outcomes' and 'learning objectives' are sometimes used interchangeably. There are subtle differences; objectives are usually a statement of intention while an outcome is a measure of achievement".

However, to avoid trying to distinguish been respondents' meaning, this Study's analysis made no distinction between those stating "intent" and those stating "measures of achievement"; for simplicity the single term 'learning objective' is used in the following discussion.

Only 36.4% (48) responded affirmatively that they had such learning objectives but only 17.4% (23) stated these, the balance provided none. In only 9.1% (12) did the learning objectives explicitly refer to SpLDs. A further 8.3% (11) briefly described some potential teaching adaptations for students with SpLDs but gave no learning objectives, Table 88. One of these latter respondents provided links to its teaching materials which provided academics with online summaries of seven typically encountered SpLDs. These provided a description of the particular SpLD, the "Things students with [this SpLD] may find hard to do" and "Top tips for teaching students with [this SpLD]". This HEP's materials appeared the most understandable, comprehensive, practical and easily applied of those supplied. Of those not answering affirmatively, 3.8% (5) said that SpLDs were given explicit consideration and 6.8% (9) considered SpLDs only in the context of the existing support model of

Individual Learning Plans and Individual Reasonable Adjustments and not the social model where barriers to learning are removed (Oliver, 1990); (Oliver & Sapey, 2006), see also S.3.1:

Table 88: Answers to the question: "Does the training explicitly include teaching students with SpLDs? And if so, what are the learning objectives of the relevant modules?" n=132	
Yes, of which:	36.4% (48)
With learning objectives stated (with and without reference to SpLDs)	17.4% (23)
Where learning objectives specifically referenced SPLDs	9.1% (12)
No learning objectives given but adaptations for SpLDs mentioned	8.3% (11)
No, of which:	
But SpLDs given explicit consideration	3.8% (5)
SPLDs only referred to in context of Individual learning Plans and Reasonable Adjustments by individual	6.8% (9)

These responses identified at least four issues, first that there was a significant gap in information about SpLDs provided to academics in their inclusive teaching training; many academics might have received none. Second, the information might have been generic rather than specific, and that only 8.3% (11) might have been taught about teaching adaptations for their SpLD students, as an Equity Group. The fourth issue relates to the quality of the learning objectives as objectives.

The SMART criteria comprise a management technique to assess objectives' effectiveness as Specific, Measurable, Achievable, Relevant and Time-bound (Chartered Institute of Management, 2011)[40]. Applying SMART to the 12 sets of SpLD-specific learning objectives supplied by respondents yielded Table 89 and Table 90, which identified the three adjudged most and least effectively stated, respectively. Whilst even the 'SMARTest' learning objectives did not 'tick all the SMART boxes', the least SMART failed most.

This analysis paints a woeful picture of the training provided to academics relating to the needs of students with SpLDs. Somewhat frustratingly, it seems that HEPs had not heeded HEA's advice that attitudinal, behavioural and content change could only be achieved academic by academic at subject level (HEA/Advance HE, 2015), see also S.3.4.15.

However, these responses were derived via an FOIR, Atkinson & Coffey (2011) cautioned that such data might represent an 'alternative reality' to the actual situation. Hence, the next section triangulates FOIR2's responses against the definitional underpinnings of the HEA's Fellowship Scheme which, as the number of adherents shows, is a widely used academic training framework.

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[40] An alternative to SMART objectives, using the acronym VASCULAR, was discussed by Prof Sally Brown at https://thesedablog.wordpress.com/2019/03/07/sally-brown/ in response to the question "Why are learning outcomes (often) so dreadful?"

	Table 89: Examples of effective learning objectives provided by respondents when adjudged against SMART criteria	
HEP	**Examples of Learning Objectives [Verbatim quotes]**	**Comparison to SMART criteria (Researcher's opinion)**
1	Identify a variety of accessibility tools and measures, Identify the most common difficulties that students have in HE – dyslexia, mental health issues, dyspraxia – and ways these might impact their ways to access university, Come up with solutions to common disability-related situations in teaching, Reflect on theories of disability and what they mean for higher education.	Specific - yes Measurable – some, not all Achievable - yes Relevant - yes Time bound - no
2	Aims and outcomes typically refer to broader terms like inclusion, diversity and disability rather than protected characteristics or disabilities." The exception is the 1-hour session on Understanding Specific Learning Differences. At the end of this session participants will: Know five new facts that affect students with Specific Learning Differences, Have one action point to improve support for students with Specific Learning Differences in their role, Explain how University X screens for and assesses Specific Learning Differences, Explores internal and external (to the University) support options, Discuss a case study; and [have] time for discussion.	Specific - yes Measurable – some, not all Achievable – yes Relevant – yes Time bound - yes
3	By the end of this session, candidates will: Understand the Social Model of disability and how this applies to learning and teaching, Recognise that students with disabilities fall along a continuum of differences rather than constituting a separate category, Identify some of the key features of Specific Learning Differences (dyslexia, dyspraxia, ADHD, Asperger's) and how these might impact on learning across a range of contexts (including lectures, group work, reading tasks, language teaching and one-to-one meetings, Be better equipped to identify which teaching methods would be more or less inclusive of students with a variety of Specific Learning Differences, Know how to provide opportunities for students to make their individual learning needs known.	Specific - yes Measurable – some not all Achievable – yes Relevant – yes Time bound - no

Table 90: Examples of ineffective learning objectives provided by respondents when adjudged against SMART criteria		
HEP	**Examples of Learning Objectives (verbatim quotes)**	**Comparison to SMART criteria (Researcher's opinion)**
4	Raise staff awareness, Familiarity with a number of teaching strategies, Awareness of multiple sources of support within HEP.	Specific - no Measurable – no Achievable - yes Relevant - partially Time bound - no
5	[HEP 5] has a module that is focused on Student support and personal tutoring but our learning outcomes are much more holistic rather than focusing on one group of students so for example we have an outcome that states: 1) Outline and critically discuss the purpose, functions, and value of student support and personal tutoring systems including using technology where appropriate 2) Take account of the diverse nature of the student body and other users of student support, as well as ethical issues when taking action.	Specific - no Measurable – no Achievable – yes Relevant – partially Time bound - no
6	Students with these learning needs are discussed as part of a wider discussion and consideration of how to design teaching and assessment for students with diverse learning needs. Relevant learning objective: Demonstrate an understanding of the principles that underpin a learning environment that values diversity and ensures equality of opportunity for all learners.	Specific - no Measurable – potentially Achievable – yes Relevant – partially Time bound - no

5.7.4.3. Training of academics - HEA Fellowship Scheme (Triangulation)

A number of respondents, 9.1% (12 of 132) explicitly identified that the HEA's Fellowship Scheme was used as the basis for their in-house PGCHE training or CPD-route to a teaching qualification and a further 16.7% (22) mentioned their use of the UK Professional Services Framework which underlies the Fellowship Scheme. Others referred to the scheme as something their academics could or would join once they had gained their teaching qualification. HEA's Fellowship Scheme enjoyed considerable success, Table 91, (Hustler & HEA, 2018)[41].

Table 91: HEA Fellowship Scheme Holders (Hustler & HEA, 2018)		
Category of HEA Fellowship	**Total at each category**	**Number Fellows self-reporting their employer is in UK**
Associate Fellow	23,538	19,853
Fellow	75,033	61,224
Senior Fellow	9,557	8,370
Principal Fellow	995	800
Total	**109,123**	**90,247**

The above figure, of 90,247 UK-employed holders of a Fellowship, compares to a total of 206,870 academics employed by UK HEPs for AY2016/17 (HESA, 2018b). Assuming these data relate to the same parameter, dividing the former by the latter suggests that 43.6% of UK-employed academics held a category of HEA Fellowship. As mentioned above, HESA's detailed AY2016/17 data showed that in England 54.2% held a teaching qualification (HESA, 2018a). These broadly corroborating figures, that only approximately half of academic staff held an HE teaching qualification, suggest only modest progress by HEA in its 15-year history before being incorporated into OfS in 2018. However, in mitigation, participation in the Fellowship Scheme was always voluntary, as envisaged from HEA's inception (HEFCE, UUK Standing Conference of Principals, 2003).
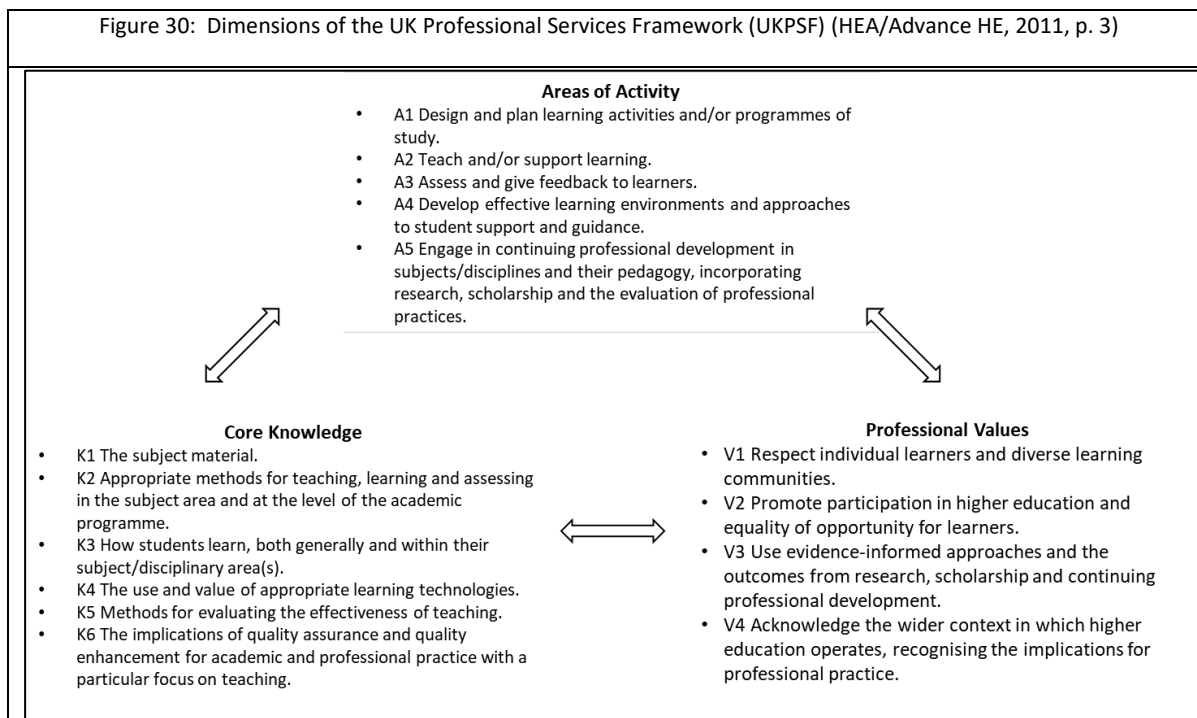
5.7.4.4. Potential reasons for lack of means to teach inclusively

HEA Fellowship Scheme

HEA's Fellowship Scheme was based upon the UK Professional Services Framework (UKPSF) "…we manage and lead the development of the UK Professional Standards Framework (UKPSF), a nationally-recognised framework for benchmarking success within HE teaching and learning support" (HEA/Advance HE, 2011).

UKPSF comprises three dimensions: Areas of Activity, Core Knowledge and Professional Values, Figure 30, exercised at four descriptor levels corresponding to Membership Categories – Associate Fellow, Fellow, Senior Fellow, Principal Fellow.

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[41] HEA did not provide numbers of English Fellowship holders.

Figure 30: Dimensions of the UK Professional Services Framework (UKPSF) (HEA/Advance HE, 2011, p. 3)

Areas of Activity
- A1 Design and plan learning activities and/or programmes of study.
- A2 Teach and/or support learning.
- A3 Assess and give feedback to learners.
- A4 Develop effective learning environments and approaches to student support and guidance.
- A5 Engage in continuing professional development in subjects/disciplines and their pedagogy, incorporating research, scholarship and the evaluation of professional practices.

Core Knowledge
- K1 The subject material.
- K2 Appropriate methods for teaching, learning and assessing in the subject area and at the level of the academic programme.
- K3 How students learn, both generally and within their subject/disciplinary area(s).
- K4 The use and value of appropriate learning technologies.
- K5 Methods for evaluating the effectiveness of teaching.
- K6 The implications of quality assurance and quality enhancement for academic and professional practice with a particular focus on teaching.

Professional Values
- V1 Respect individual learners and diverse learning communities.
- V2 Promote participation in higher education and equality of opportunity for learners.
- V3 Use evidence-informed approaches and the outcomes from research, scholarship and continuing professional development.
- V4 Acknowledge the wider context in which higher education operates, recognising the implications for professional practice.

However, neither in the above dimensions nor accompanying text does the phrase 'inclusive teaching' appear, nor indeed the word inclusive itself. This absence seems surprising, the more so as DSSLG referenced HEA's statement that "inclusive learning and teaching recognises all students' entitlement to a learning experience that respects diversity, enables participation, removes barriers and anticipates and considers a variety of learning needs and preferences" without perhaps realising that HEA's Fellowship Scheme lacked the structural wherewithal to achieve those aims (DSSLG, 2017).

This absence of specificity was confirmed by a National Teaching Fellow and Principal Fellow of the HEA (PFHEA) whose role was Accreditation Lead for an HEP's CPD Scheme (Edgehill University, 2018), "I think the UKPSF, though not explicitly, expects through A1-5, K2-3 and V1-2, that 'inclusion' is vital but I agree that not all staff are necessarily aware of its broader and deeper implications" (Bostock, 2019). In a useful further triangulation, the need to focus on staff training, was shown by Williams et al. (2019, p. 83), *Staff engagement with training* was placed first in a list of issues still to be addressed at 85.0% and *Inclusive teaching and learning delivery* second at 80.0% of their respondents (n=60).

Summarising, FOIR2 revealed 36.4% (47) of respondents claimed to address SpLDs in their inclusive teaching training, but only 9.1% (12) provided learning objectives which mentioned them, of which only 2.2% (3) would qualify as SMART in the researcher's view. The lack of substance and weakness in learning objectives suggests that sector-wide little is done in academics' inclusive teaching education to address SpLDs, the largest group of disabled students. Given the lack of explicit reference to inclusive teaching in the UKPSF, which underlies HEA's Fellowship Scheme, this paucity is not surprising. Overall, it seems unlikely

that May & Bridger's (2010) aim of "systemic change at…the…practice level…" could have happened with academics lacking such Means to realise it.

Quality Assurance Agency (QAA) UK Quality Code (UKQC) for HE (QAA, 2012)

DSSLG's report, stated unequivocally that (DSSLG, 2017):

> "Course validation/re-validation regulations need to reflect the requirements of the EA [Equality Act, 2010] in terms of inclusive practice. As courses are validated/re-validated particular attention should be placed on ensuring that genuine competence standards have been developed".

This section investigates the extent these standards might have been developed.

In answer to FOIR2's questions regarding course validations, 6% (7 of 132) responded that they used the UK Quality Assurance Agency's (QAA) *Quality Code Chapter B, Ensuring & Enhancing Academic Quality, Chapter 3 Learning & Teaching* to guide their validation methodology and content of validation criteria (QAA, 2012).

Chapter B3's preamble, as for other Chapter B preambles, stated (QAA, 2012, pp. 1-2):

> "The UK Quality Code (UKQC) for Higher Education … is the definitive reference point for all UK higher education providers. It makes clear what higher education providers are required to do, what they can expect of each other, and what students and the general public can expect of them."

However, this preamble states the following caution:

> "Higher education providers are responsible for meeting the requirements of legislation and any other regulatory requirements placed upon them, for example by funding bodies. The Quality Code does not interpret legislation, nor does it incorporate statutory or regulatory requirements."

These two statements appear opposed, offering authoritative guidance whilst simultaneously side-stepping responsibility. Nevertheless, this research assumes that the QAA UKQC was taken as the 'definitive reference point' and informed HEPs' course validations, see Opportunity section below, and their staff training. This assumption is based on the idea that no alternative code or guidance existed, hence UKQC became the default definitive standard.

However, Chapter B3's introduction, in common with the other UKQC Chapters, did not define inclusive teaching as such but in the section entitled 'Equality, diversity and equal opportunity' referred to HEPs providing "An inclusive environment for learning [which] anticipates the varied requirements of [learners']…declared disability, specific cultural background, location, or age…" (QAA, 2012, p. 5); the term "inclusive environment" was not defined.

Chapter B3 later referred to the qualifications of staff, Indicator 4 stating that "Higher education providers [should] assure themselves that everyone involved in teaching or supporting student learning is appropriately qualified, supported and developed." (QAA, 2012, p. 15). Unfortunately, as revealed in the above analysis of HESA's data, this encouragement to HEPs to train their academic staff has not, by some margin, flowed through into 100% qualified staff as 29.4% are reported in AY2017/18 as explicitly without a teaching qualification (HESA, 2019a).

Indicator 4 further stated, therefore commended, to HEPs that:

"The UK higher education sector…has endorsed the [UKPSF], which is managed by the [HEA]. The purpose of the framework is to provide threshold standards against which [HE] teachers and facilitators of learning may benchmark their practice" (QAA, 2012, p. 16).

However, as the above analysis showed, the UKPSF lacked definitional and operational specificity regarding inclusive teaching. Hence the QAA amplified the deficiencies in the UKPSF; staff whom the UKQC expected to teach inclusively had neither definition nor framework provided by the UKPSF, potentially explaining FOIR2's findings.

The situation regarding the UKQC's (2012/13) omissions regarding inclusive teaching were not materially addressed in the later, 2018, versions of the Advice and Guidance documents. None of the three relevant new documents, from 12 in total, which might have been expected to define inclusive teaching in their Terminology sections did so (*Assessment* (QAA, 2018a); *Expectations & Practices for Teaching & Learning* (QAA, 2018b); *Course Design* (QAA, 2018c)). Similarly, none of the members of the Writing Groups of the respective documents carried a job title which implied expertise in inclusivity or inclusive teaching. However, the new *Expectations & Practices for Teaching & Learning* document did contain some 11 references to inclusive teaching, inclusive design or the need to be inclusive, even though, as mentioned above, there were no definitions offered. However, the *QAA Assessment* guidance did refer to the social model of disability, as the avoidance or removal of "[b]arriers which impede access to assessments" although this aim is not repeated in the other two guidance documents mentioned here (QAA, 2018a).

Finally, as with the 2012 code, for English HEPs, the Advice and Guidance offered by the 2018 UKQC remained just that and was not mandatory in England but was, perhaps surprisingly, within the devolved regions (QAA, 2018d):

> "Common practices - focus on enhancement. They are mandatory requirements for all providers in Scotland, Wales and Northern Ireland. In England, providers may wish to work towards these, but are not required to do so as they are not regulatory requirements and will not be assessed as part of the OfS's regulatory framework."

Clearly, the DSSLG's urgings about the requirement for validations to reflect the need for inclusive teaching had not flowed through to the 2018 version of the UKQC. Confirmation of this lack of flow-through is provided by Williams et al. (2019, p. 83) of whose HEP

respondents 76.7% (n=60) gave inclusive course/module design/validation as still outstanding in "moving towards a more inclusive model of support". The next section, *inter alia,* examines responses to FOIR2's question regarding course validations.

Section summary

Of English HEP respondents, 62.1% (82 of 132) did not define inclusive teaching, few academics received training in inclusive teaching, still fewer training which embraced teaching explicitly to meet the needs of the largest anticipatable Equity Group of disabled students, those with SpLDs . Neither the HEA's Fellowship Scheme nor its underlying UKPSF addressed inclusive teaching, and neither the QAA UKQC 2012/13 nor later 2018 version provided either definitive or mandatory requirements to embrace inclusive teaching at English HEPs. These findings indicate strongly that academics across English HEPs significantly lack the Means to teach inclusively.

5.7.5.   Opportunity – "an occasion offering a possibility
(Chambers Dictionary, 1998)

This section presents and discusses responses to FOIRs1 and 2 regarding HEPs' use of their HEFCE Disability Premium grants (FOIR1) and the way they validated their courses/modules against criteria of inclusive teaching (FOIR2). Together these FOIRs provide an idea of academics' Opportunity to develop and deliver validated courses which included inclusive teaching. FOIR1's and FOIR2's responses are triangulated against the HEFCE/OFFA/OfS's response to FOIR3 and FOIR4. These latter provided data on the monitoring exercise *Widening Access, Improving Retention and Improving Provision for Disabled Students* (HEFCE, 2017b). The analysis reveals a lack of Opportunity for academics to teach inclusively and suggests that a contributory reason is omissions within the Quality Assurance Agency's Chapter B1 Programme Design, Development and Approval (QAA, 2013).

5.7.5.1.   Data comparability – FOIR1, and FOIR3 and FOIR4

Data gained in FOIR1, and FOIRs3 and 4 although derived in different ways, were comparable.

FOIR1 asked HEPs, in an open-ended question, how they spent/utilised their HEFCE disability premium, allowing respondents to dictate categories. Conversely, FOIR3 and FOIR4 requested data captured in the HEFCE/OFFA/OfS monitoring exercise over five specified categories (HEFCE, 2017b, p. 9):

1. On-going, core work to support disabled students (AY2017/18 only)
2. Expansion of disability services (additional staff, training and resources),
3. Expansion of assistive technologies,
4. Improvement of inclusivity of teaching and learning,
5. Creation or extension of learning support posts,
6. Other

Within *Improving of inclusivity of teaching and learning* the monitoring return requested data on (HEFCE, 2017b, p. 30):

> "Staff specialising in inclusive support such as providing training, raising awareness and promoting the aims of inclusive learning and teaching across faculties; strategies to assure quality and embed inclusive practices including learning walks, observations of teaching (including peer observations), filming of teaching for self-evaluation and self-improvement and sharing of good practice; and inclusivity review built into course design and curriculum development."

To facilitate comparability in this analysis, these monitoring data descriptions are used to create a common basis for comparing the activities identified as related to inclusive teaching and learning in FOIR1 and monetary amounts identified in the monitoring return; these common categories are ***italics bolded*** in Table 92.

Note that FOIR1 asked HEPs about both AY2016/17 and AY2017/18 whilst FOIR3 and FOIR4 data referred separately to AY2016/17 and AY2017/18 respectively. Note also that FOIR1's responses concerned the use of the Disability Premium whereas FOIR3's and FOIR4's data reported HEPs' broader spending on disabled students, referred to as "Student success expenditure for support for disabled students" (OfS, 2018c).

5.7.5.2. *Using the Disability Premium (FOIR1. n=131)*

FOIR1's phrasing assumed that HEPs would have used their Disability Premium funds on specific projects, responses showed only 19.1% (25) did so. Nevertheless, FOIR1's phraseology established for many respondents the need to respond with detailed information leading to categorisations shown in Table 92. Disability Premium funding was provided without explicit hypothecation but to support costs of activities which would promote inclusion and remove barriers to participation and success for disabled students (HEFCE/OFFA, 2017).

Comparing these FOIR1 expenditure categories against HEFCE's abovementioned guidance note (HEFCE, 2017b, p. 30) shows only the 7th, 8th, 14th and 16th categories ranked by number of mentions might relate to *Improvement of inclusivity of teaching and learning*. These low rankings suggest that HEPs' priorities lay less in "…supporting HE providers to move towards inclusive models of support" and more in using the existing support model to "meet the rapid rise in students reporting disabilities, particularly mental health issues" (HEFCE, 2016a, p. 4). Alternatively, HEPs' other institutional funding priorities might have limited their ability to use the funding in HEFCE's preferred way to improve inclusivity of teaching and learning. Williams et al. (2019, pp. 77-79) confirmed either explanation, showing funding to support existing disability services as the top destination, 78.3% (n=60) with improvement of teaching and learning much lower down the list 50.0% (n=60).

	Ways in which the HEPs allocated the funds (*Italics + bold* = construed as within HEFCE/OFFA monitoring return category **"Improvement of inclusivity of teaching and learning"** (HEFCE, 2017b, p. 9)	% Reporting
	Table 92: FOIR1 responses showing ways in which HEPs spent their Disability Premium AY2016/17 & AY2017/18. n=131	
1	Supporting existing Disability Service	38.5%
2	Additional posts (Learning support, project coordinator, AT specialist, Disability Advisor, Mental Health (MH))	34.6%
3	Physical accessibility (audit & construction in estate: academic, residential; mobility	30.0%
4	Funding activities when DSA runs out/ are outside scope (Bands 1 & 2 NMH support)	26.9%
5	AT provision (New AT centre/software, document conversion; AT into study skills)	21.5%
6	Funding diagnostic assessments, laptops	19.2%
7	*Staff development (ASD, MH, British Sign Language (BSL), inclusivity)*	*17.7%*
8	*Teaching/curriculum development (inclusivity, Universal Design for Learning)*	*16.2%*
9	General allocation to HEP's schools, typically using HEFCE disability premium formula	13.1%
10	Software, IT, materials accessibility (audit, in-house systems, VLE, academic materials)	12.3%
11	Online & workshop support system (ASD, MH)	12.3%
12	Pre-sessional orientation/transitional programme, triage	10.0%
13	No specific information/referral to Access Agreement	10.0%
14	*Lecture recording (Voice enhancement/hearing loops)*	*8.5%*
15	Student employability projects (ASD, Unitemps[42], Lynda[43], Disability Confident[44])	8.5%
16	*Inclusivity/future model review or audit*	*7.7%*
17	Peer support/mentoring development	7.7%
18	Academic, work placement/ pastoral support, responding to Reasonable Adjustments	6.9%
19	Outreach (Schools & FECs, media, conference participation)	6.9%
20	Enhanced internal systems (eg Customer Relationship Management, offer handling, student feedback initiatives))	3.1%
21	Screening for SpLDs	2.3%
22	Subject specific support (maths)	0.8%

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[42] https://www.unitemps.com
[43] https://www.lynda.com
[44] https://disabilityconfident.campaign.gov.uk/

5.7.5.3.   *Widening Access, Improving Retention and Improving Provision for Disabled Students Monitoring Returns AY2016/17 and AY2017/18*

FOIR3 by-institution data for AY2016/17 showed that of £71.6m spent by English HEPs on S*tudent success expenditure for support for disabled students* only £7.3m (10.2%) was directed towards *Improvement of inclusivity of teaching and learning*; FOIR4's comparable figures were £77.3m and £4.6m (6.0%) respectively. Figure 31 illustrates the distribution of expenditure over the two years, showing clearly that more HEPs spent less in AY2017/18 than in the prior year.

Note: OfS's published summary level data shows slightly discrepant data of £77.7m and £8.7m (11.2%) (OfS, 2018c) and £84.1m and £5.6m (6.6%), respectively (OfS, 2019b).

Figure 31: Widening Access, Improving Retention and Improving Provision for Disabled Students Monitoring AY2016/17 & AY2017/18. "Improvement of inclusivity of teaching and learning" as a % of total "Student success expenditure for support for disabled students"
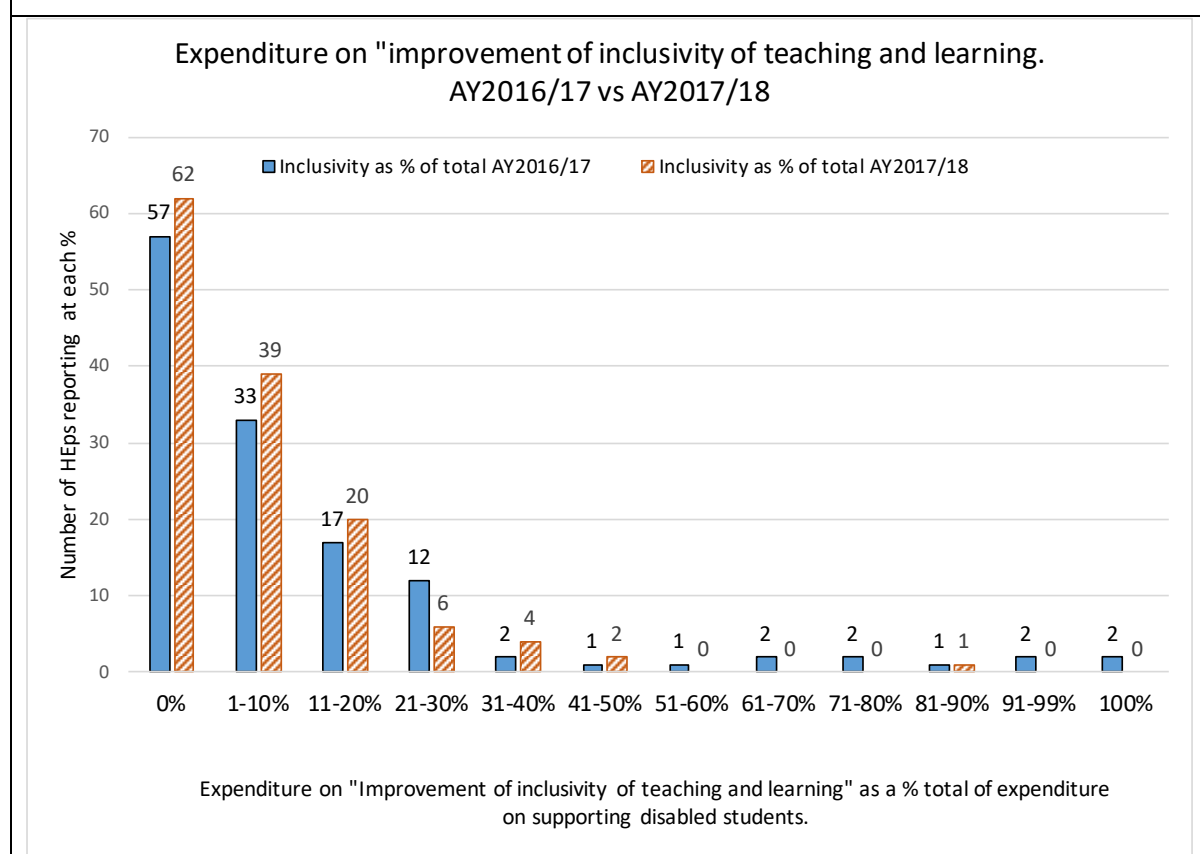
Advisory notes accompanied OfS's FOIR4's response:

1. Annual monitoring returns were "just one source of information…to inform our understanding… [and] will not necessarily capture all…funding …[supporting]…access and participation activity",

2. Provider level information had not been published as it may mislead regarding level of commitment to access, success and progression for disabled students…the figures

may…be a partial and estimated representation [due to those activities being] "embedded…[and] difficult to disaggregate". "Premium funding was not ring-fenced", providers had usage discretion.

Discussion of FOIR3 and FOIR4's data

These data appear to support FOIR1's findings that expenditure relating to inclusive teaching and learning for disabled students is relatively low. Although OfS's advisory caution that FOIR3's and FOIR4's data might only paint a partial picture of inclusive teaching and learning is noted, if those activities are embedded and difficult to disaggregate how are they objectively monitored, reported up and assessed? Further, if the data represent but a partial and misleading picture, what worth exists in their collection? OfS is silent on both questions.

Notwithstanding the potentially partial picture revealed by these data, the reduction between AY2016/17-AY2017/18 of expenditure on improvement of inclusivity of teaching and learning from £7.3m (10.2% of total) to £4.6m (6.6% of total) is worrying, leaving an open question, "What might be the justification for a sector 37.0% reduction in a year?" The distribution of expenditure is also worrisome. Almost half of HEPs reported expending nothing or trivial sums on *improvement of inclusivity of teaching and learning* in support of their disabled students.

However, the data collection method may be flawed. AY2017/18 returns included an additional category *On-going, core work to support disabled students*, so whilst 2 year sector-wide overall expenditure remained similar, £71.6m and £77.3m, individual HEP's returns could reflect different distribution between categories, further 'muddying the waters' regarding improvement of inclusivity of teaching and learning.

5.7.5.4.   *Course Validations and Inclusive Teaching*

FOIR2 also investigated course validations, asking, "What percentage of your courses have so far been so validated/revalidated [against inclusive teaching criteria]? Some 66.7% (88) replied that they validated their courses using criteria relating to inclusive teaching. Despite being asked, 28.8% (38) gave no indication of the percentage of courses so validated although 37.9% (50) did so, Table 93, suggesting that just under a third of HEPs had 100% of courses so validated. A further 9 HEPs said the matter was under discussion. However, comparing these 50 to those who stated they had an agreed definition of inclusive teaching reveals that only 42.0% (21 of 50) had a definition. Even for those stating 100% of courses validated against inclusive teaching criteria only 53.9% (21 of 39) possessed a definition. This absence of definition begs the question as to the rigour of the validation processes.

Williams et al. (2019, p. 69) showed 56.7% of HEPs' (n=67) possessed either mandatory or voluntary validations containing expectations of inclusive teaching for AY2018/19, providing a somewhat approximate triangulation. However, Williams et al. gave neither the nature of those validations nor potential sources of guidance. Williams et al. (2019, p. 83) also

reported that 76.7% identified inclusive course/module design validation as still outstanding, third in importance after inclusive teaching and learning delivery (80.0%) and staff engagement with training (85.0%).

Table 93: Course validations using inclusive teaching criteria by percentage bands, FOIR2 responses n=132						
Percentage of courses validated using inclusive teaching criteria	Number of respondents reporting within each percentage band	Number with definition of inclusive teaching within each percentage band	Number without definition of inclusive teaching within each percentage band	Number of pre-1992 HEPs within each percentage band	Number of post-1992 HEPs within each percentage band	Percentage of total respondents (n=132)
0-20%	4	0	4	1	3	2.3%
21-50%	2	0	2	0	2	1.5%
51-75%	1	0	1	0	1	0.8%
76-99%	4	2	2	2	2	2.3%
100%	39	21	18	16 (of which 7 also had a definition)	23 (of which 14 also had a definition)	29.6%
	50	50		50		

Table 93 also compares the number of pre- and post-1992 HEPs in each percentage band which suggests that post-1992 institutions are more effective at validating their courses against inclusivity criteria. Additionally, post-1992 institutions which had a definition and 100% validated courses numbered 14 compared to only 7 pre-1992 institutions. However, these data are self-reported without the possibility of triangulation. Nevertheless, other research has shown that post-1992 HEPs may be more academically effective and academically efficient (Pursglove & Simpson, 2007) and better at adapting to change (Cranfield & Taylor, 2008) than their pre-1992 peers.

FOIR2's next question, "By what date you expect to have all your courses so validated/revalidated?" elicited a range of replies between 2019-2024, but data was very partial.

In answer to the question, "What are the key validation/revalidation criteria relating to inclusive teaching in general and for students with SpLDs in particular?" 54.5% (72) described the way in which the validations occurred and some of the criteria which were used. These responses included HEPs which had decided on a method of validation but had not yet implemented it. A four-level pattern emerged in validation methods relating to inclusive teaching based on the degree of specificity in validation submissions.

In decreasing levels of specificity, HEPs required proposers to (n=72):

1. **Respond to a checklist** specifying the HEPs' inclusivity expectations, 8.3% (6)
2. **Describe how** their courses achieved inclusivity, 13.9% (10)
3. **Provide a statement** that their courses were inclusive, 20.8% (15)
4. **General compliance** with HEPs' inclusivity policies and procedures, 56.9% (41)

This pattern is illustrated by examples of the requirement within each validation category, see S.20, Appendix 14 The checklist level is the most exacting, the general compliance category is the least. Arguably, this latter level is so weak as to be ineffective to drive the implementation of inclusive teaching. Even level 3, providing a statement, may not be particularly challenging. Potentially, only levels 2 and 1 are sufficiently challenging, representing only 22.2% (16 of 72) of those providing any validation criteria and only 12.1% (16 of 132) of total respondents. The rigour of even those apparently more exacting levels 1 and 2 validation methods should be seriously questioned where the HEP has no definition of inclusive teaching, only half of the 16 reporting the two upper levels of validation possessed a definition. Hence, potentially only 8 of the 132, 6.1%, might possess exacting validation levels and a definition of inclusive teaching to support the validation method.

Although outside the scope of this research, it would be useful to understand the interaction of Public Sector Regulatory Bodies', such as the Royal College of Veterinary Surgeons, General Medical Council, validation requirements and their interaction with HEPs' course validation processes (HESA, 2016c).

Again, although beyond the scope of this research, it would be interesting to discover which HEPs reporting that 100% of their courses were validated against inclusive teaching criteria also transparently published that data in detail to allow prospective students to make an informed choice of HEP. This degree of transparency is important to students, as for example, the question of the inclusive nature of a course may vary depending significantly on the nature of the course eg for students with mobility problems participation in fieldwork in, say a geology, course, would be very different to participation in an accounting placement conducted wholly in an office environment. See also the example discussed in S.2.4.

All validation levels assume that those adjudging validation possess effective knowledge of inclusivity and inclusive teaching practice to provide adequate challenge to those seeking validation. As discussed above, S.5.7.4.4, given shortcomings in the HEA Fellowship Scheme and the situation revealed in HESA's data relating to trained and untrained staff, academics' knowledge of inclusivity and inclusive teaching should not be taken as a given. Hence, validation processes, however robust otherwise, might have been be weak in terms of knowledge concerning inclusivity and inclusive teaching.

5.7.5.5. ***Potential reason for absence of or weakness in validating against criteria relating to inclusive teaching***

The QAA's 2013 UKQC Chapter B1, as for Chapter B3, above, promoted equality, not only in the common Preamble, but also stated (QAA, 2013, p. 5):

> "In setting out criteria…[for]…the design and development of programmes and testing the fulfilment of these criteria in programme approval, [HEPs] take into account the entitlements of a body of students who reflect the diversity of protected characteristics and prior educational experience, and promote the development of inclusive practice."

Additionally, Chapter B1's Indicator 5 states "[HEPs] make use of reference points and expertise from outside the programme in programme design and in their processes for programme development and approval." "[D]isability practitioners and equality and diversity practitioners" are explicitly identified as potential resources (QAA, 2013, p. 13).

However, despite these statements, with definitional absence, identified by FOIR2, above, and in the UKQC documentation, it is hard to see how English HEPs, even if they followed the UKQC, which was neither mandatory nor definitive and subject to their own interpretation (QAA, 2013, p. 1), were given effective guidance in operationalising inclusive teaching. Indeed, the fact that only 5.3% (7) of respondents mentioned using the UKQC in guiding their validation process suggests its usage might be somewhat limited.

Additionally, as stated above, the 2018 version of the UKQC would appear to have offered no material improvement in the way inclusive teaching should be validated.

5.7.6.   HEP Case Study

One HEP provided its 2017 Programme Approval Policy (Brunel University, 2017a) and 5-page Inclusive Learning and Teaching Guidance for Staff (Brunel University, 2015). These documents, the HEP's response to FOIRs1 and 2 and its data in FOIRs3 and 4 are discussed, below, to illustrate how elements of inclusive teaching were addressed at one HEP.

Programme Approval Policy

The Policy mentioned "inclusive" only once, the final item of twelve listed "attributes as characteristic of successful programmes".

Programme design teams had to include a "Recognised Programme Developer" trained in "equality and diversity". However, no mention was made that members of Design Approval Panels required such knowledge, but Panels had "to consider all aspects of the…design in the context…of the defined Successful Programme Attributes." Panels could include appropriate "representative[s] from a relevant Academic Service Department".

The Guidance identified inclusive teaching as comprising inclusive curriculum design, teaching practices, and assessment and feedback, stating:

"…inclusive learning and teaching…means that we are all invited to consider what we could do better to ensure that all our students are engaged and supported in their learning and to reflect on our practice on an ongoing basis so that we are continuously improving the learning environment for our students".

The Guidance provided a range of internal and external links to advice about and illustrations of good practice for inclusive programme designers and teachers, plus a short reading list covering inclusive curriculum design, outcomes, assessment and teaching practices. The Guidance did not offer explicit operationalising advice.

HEP's responses to FOIRs 1, 2, 3 and 4

FOIR1 response

The HEP received approximately £600k in Disability Premium over AY2016/17 and AY2017/18 and responded, "[t]he HEFCE grants referred to were directly allocated to the Dyslexia and Disability Service. The funding pays for the costs of running the service, principally staff costs."

FOIR2 responses

Inclusive teaching was not defined.

Both new and existing academics pursued teaching qualifications through the HEA Fellowship Scheme linked to an internal study programme. 47% of academics had completed this study programme at the time of response, comprising 462 completed (FOIR2 response) of 975 declared academics (HESA, 2018a).

The HEP reported no SpLD-related learning objectives within the study programme, although it made "Explicit connections…to the resources and activities of the University's Dyslexia and Disability Service , which supports student facing support, and teaching staff are encouraged to contact [the Service]…should they have concerns about a specific student."

FOIR3 and 4 responses

In AY2016/17 and AY2017/18 the HEP spent 12.5% (£86.6k) of £691k and 0% of £1.037m, respectively, of its *student success expenditure for support for disabled students* in the category *improvement of inclusivity of teaching and learning*.

Discussion

Arguably, with half its staff holding an HEA Fellowship at some level, the HEP appeared pointed in the right direction regarding staff professionalism. However, as discussed in S.5.7.4.4, the Fellowship Scheme did not explicitly address inclusive teaching in general and SpLDs specifically, undermining academics' ability to achieve inclusive teaching irrespective of numbers qualified. Indeed, the HEP's narrative response to FOIR2 acknowledged that it

did not specifically address the learning needs of its SpLD students. The HEP's achievement of inclusive teaching would be further hampered by its lack of definition of the term, notwithstanding the Guidance above which lacked operationalising specificity.

The programme design process stated the need to be inclusive, but only as one of twelve desirable attributes, Approval Panels' memberships may have lacked specific inclusivity although Recognised Programme Developers had to have knowledge of "equality and diversity", which may or may not have included knowledge of how to deliver inclusive teaching through programme development. This HEP's validation process was at the least challenging, level 4, see S.5.7.5.4.

The HEP used both years' Disability Premium wholly to support its DDS, and reported spending 12.5% of its AY2016/17 and 0% of its AY2017/18 *Student success expenditure for support for disabled students* on *Improvement of inclusivity of teaching and learning* although there was no mention of this expenditure nor descriptions of the developments so funded in its response to FOIR1. Possibly it funded inclusivity activities from other sources than the Disability Premium.

This HEP's responses and triangulating OfS evidence indicate that it was not focussed on moving to a model embracing inclusive teaching and learning, but rather remaining with the individualised, DSA funded model of support. As such it seemed to be failing to provide the Opportunities for its academics to teach inclusively.

5.7.7.   Section summary

Opportunity to practice inclusive teaching was largely absent for academics at English HEPs. Whilst some HEPs appeared to offer opportunities by spending significantly on *improvement of inclusivity of teaching and learning* for disabled students more than half did not, 56.8% and 59.7% of HEPs reported spending <5% of their *Total student success expenditure* in that way, in AY2016/17 and AY2017/18 respectively.

Structurally, the QAA UKQC's (2012/13 and 2018) absence of guidance relating to inclusive teaching might account for HEPs' failure to validate their courses against inclusivity criteria. Nevertheless, a small number of HEPs did take a robust approach to validating their courses against inclusivity criteria.

The case study demonstrated the way the various FOIR-derived data elements linked to suggest that one HEP's efforts towards inclusive teaching and learning were not yielding "systemic change at both the policy and practice levels" (May & Bridger, 2010).

5.7.8.   Conclusion – Motive, Means and Opportunity

Using FOIRs1 and 2 triangulated against FOIRs3 and 4 for all 133 English HEPs this analysis explored academics' likely Motive, Means and Opportunity to implement inclusive teaching. These data were further triangulated against HESA statistics, HEA's Fellowship Scheme plus associated UKPSF, the QAA's UK Quality Code and the TEF.

As a sector, some 'carrot' or 'stick' Motive for academics existed, but HEPs themselves appeared to lack the intent to encourage academics to implement inclusive teaching. There was no measurement of inclusive teaching contained within the sector-wide TEF, either then or its later, 2018, version. The term "inclusive teaching" was undefined by a significant majority of HEPs, 63%. The sector body, DSSLG, tasked with raising awareness issued but a single report, offering largely high-level advice and lacking follow-up. OFFA's Access Agreements regime was insufficiently rigorous to drive HEPs to embrace inclusive teaching. There was an issue with numbers of academics trained in HE-teaching, for AY2017/18 data shows the teaching qualification status of 14.6% was unknown, 29.4% were known not to hold a qualification and only 56.2% were known to hold one.

Regarding Means, training for academics in teaching inclusively appeared marked by its absence and, where present, the quality of learning objectives which specifically related to the largest group of disabled students, those with SpLDs did not appear SMART. Neither the HEA's Fellowship Scheme including its underlying UKPSF, the QAA's UKQC nor the DSSLG's report addressed the operationalisation of inclusive teaching. Hence, the Means to teach inclusively was largely absent in the sector. This conclusion is supported by the fact that in both AY2016/17 and AY2017/18 over half of HEPs spent <5% of their respective £71.6m and £77.3m *total student success expenditure* on *improvement of inclusivity of teaching and learning*.

Opportunities to deliver courses which incorporated inclusive teaching were limited by a lack of specificity and challenge regarding inclusive teaching during HEPs' course validation processes. Validations might also have lacked rigour where HEPs evaluated courses against criteria relating to inclusive teaching but without a definitional basis. Neither the QAA UKQC 2012/13 nor the later 2018 version offered explicit guidance. Additionally, those designing and administering validations may themselves have possessed insufficient inclusive teaching knowledge to be able to challenge those applying for validation.

Lacking such fundamentals, it is hard to see how English HEPs as a sector were meeting their anticipatory PSED at least for the largest group of disabled students. Those NADP 2017 conference delegates' disquiet over HEFCE's *Models of Support* report's finding that over 50% of respondent HEPs believed they were over halfway to being inclusive institutions appears well-founded. Returning to the lens of crime fiction, 5.7.1, as author Ian Rankine's Scottish police Inspector Rebus might have concluded, the case for inclusive teaching taking place in English HEPs was certainly 'not proven'.

6. Conclusions

This concluding section first compares the three key Ministerial policy announcements about the Modernisation which leads to a structural analysis of the way in which those policies may or may not have translated to effective implementation of ITL environments, as revealed by this research. There follows a detailed proposal to create a new functional organisation whose aim is to facilitate ITL environments in English HE. The section concludes by returning to the original research question.

6.1.   The Ministers' intent, how it turned out on the ground

This section compares the three Universities' Ministers stated intent regarding the Disabled Students' Allowances (DSA) Modernisation by taking extracts of announcements by Willetts (BIS, 2014a), Clark (BIS, 2014b) and Johnson (BIS, 2015c), full text Appendix 1, S.7, against how practitioners experienced that intent as they operationalised it 'on the ground' as described in S.5, above.

6.1.1.   Willetts – Initial announcement of changes (BIS, 2014a)

6.1.1.1.   Announcement intent

"We will pay for higher specification or higher cost computers…[w]e will no longer pay for standard specification computers or [their] warranties and insurance... We will no longer pay for higher specification and/or higher cost computers simply because of the way in which a course is delivered. We are changing our approach to the funding [of some] computer equipment, software and consumable items through DSAs that have become funded as 'standard' to most students."

6.1.1.2.   Findings of this research

Non-Medical Help (NMH) providers questioned the assumption that all disabled students would possess laptops or ones of sufficient power to run their recommended DSA funded Assistive Technology (AT) (JISC, 2016a), an issue which resurfaced when Universities' Minister Clarke, see S.6.1.2, below, conceded that laptops would remain funded but against a £200 up front contribution. A short lived, unsuccessful initiative existed to lobby for either the contribution's removal or its addition to students' loans (JISC, 2018a). In some situations, Higher Education Providers' (HEPs) Hardship Funds appear to have been used to fund students' contributions (JISC, 2016b). The question of this contribution's affordability again resurfaced, in an April 2020 Parliamentary question, in the context of impact of Coronavirus Disease 2019 (COVID-19) on disabled students (Sheerman, 2020) and in a note to members from the Chair of the Association of NMH Providers (Cook, 2020). The Department for Business Innovation and Skills BIS's own Equality Analysis identified this same issue as existing for students in lower Participation of Local Areas (POLAR) quintiles (2014c, p. 51).

No longer paying for the higher specification computers required for particular courses could be considered discriminatory practice by influencing disabled students' choice of course based on DSA benefit, 'cutting across' the idea of DSAs being a universal benefit for disabled students, in Willetts' own words, "The support is not means tested and is available for eligible full-time and part-time students, studying at undergraduate and postgraduate level".

6.1.1.3.   Announcement intent

"Students with Specific Learning Difficulties will continue to receive support through DSAs where their support needs are considered to be more complex."

6.1.1.4.   Findings of this research

Willett's provided no evidence of the validity for the idea of 'more complex' needs nor ideas for operationalising it. Individuals with Specific learning Difficulties (SpLDs) experienced issues depending on the many ways in which their course interacted with and challenged their SpLD(s), which can vary over the duration of the course, the way the course was delivered by individual academics, the nature of formative and summative assignments and intersectionality (Brunton, 2020); (Fletcher, 2020); (Trigg, 2020); (Jones & Kindersley, 2013, pp. 60-61).

6.1.1.5.   Announcement intent

"HEPs are expected to consider how they deliver information to students and whether strategies can be put in place to reduce the need for support workers and encourage greater independence and autonomy for their students."

6.1.1.6.   Findings of this research

HEPs and NMH providers responded in Studies 2, 4 and 5, S.5.2, S0 and S.5.5 respectively, that there was a timetable mismatch, a mere 15 months (initial live date was AY2015/16, but see S.6.1.2.1), was insufficient to accommodate such extensive changes. Additionally, NMH practitioners were already expected to encourage independence and autonomy in their learners, but the idea was not new (ADSHE, n.d.); (Cottrell, 2001, p. 5). Potentially HEPs and practitioners could have worked together to advance this aim, however, if the Australian First year Experience (FYE) programme which started in the early 2000s and was still actively being developed in 2014 (Kift, 2015) is any guide, the timescale for achievement would be significantly longer than 15 months between announcement and live date.

Whilst Willetts did not announce, nor did he subsequently develop, the idea of a sector-wide initiative to help achieve his aim, additional monies were made available through the Higher Education Funding Council's (HEFCE) Disability Premium to help individual HEPs move to more inclusive environments, although these came too late to influence the lead-up to the Modernisation's even ultimate live date of AY2016/17 (HEFCE, 2016a, p. 4). However, as FOIRs1, 3 and 4 demonstrated, HEPs' expenditure on developing their inclusive

curricula was a low priority. Similarly, there was no recognition that to achieve curriculum changes such that reliance on DSA support might be reduced would require the active participation, inevitably including training in inclusive teaching, of over 133,000 English teaching academics (HESA, 2019a). Such training in inclusive teaching, for example in the sector-wide Higher Education Academy (HEA) Fellowship Scheme, did not exist, see S.5.7.4.3.

6.1.1.7.   Announcement intent

"We will look to HEPs to play their role in supporting students with mild difficulties, as part of their duties to provide reasonable adjustments under the Equality Act. These are partly anticipatory duties and we expect HEPs to introduce changes which can further reduce reliance on DSAs and help mainstream support."

6.1.1.8.   Findings of this research

Assuming that 'mild difficulties' were the opposite of 'complex needs' Willetts provided no insight into how a mildness/complexity threshold might be determined, see S.6.1.1.4.

The suggestion that changes might be introduced to reduce reliance on DSAs revealed a misunderstanding of the way DSAs were awarded. Typically, students with SpLDs would have sought a diagnosis during primary or secondary education (it is lifelong disability, see Jones and Kindersley (2013, pp. 117-148) for a discussion about SpLDs in early years, primary and secondary ages) and would typically apply for DSA just prior to entry to tertiary education, ie before they knew or could experience the level to which their SpLDs would affect their achievement, see Figure 1 in S.2.1. Hence, even if an HEP's courses were considered 100% compliant with its Public Sector Equality Duty (PSED), although what that might mean in practical terms was not defined, students would arrive with DSA already awarded. The statement/aspiration might have been sustainable for those students whose SpLDs became apparent only after commencing tertiary education. However, the Student Loans Company (SLC) neither reported on the number of DSA awards to students in this category nor tracked this number internally, due to data not being cost-effectively accessible, see S.4.3.2.5. Hence it would have been impossible to project any potential change in DSA reliance by reducing these students' applications.

6.1.1.9.   Announcement intent

"The changes in this statement will apply to students applying for DSA for the first time in respect of an academic year beginning on or after 1 September 2015. This provides sufficient time for us to work with institutions and stakeholders to ensure the changes are introduced effectively."

6.1.1.10.   The findings of this research

Respondents to Study 4, S.0 and Study 6, S.5.5.2, identified implementation timescales as unfeasible. There had been no warning of this Modernisation, the sector was working from

a 'standing start'. Indeed, the sector had been formulating a Non-Medical Help (NMH) Charter since 2006, which although independent of BIS was known to it (Anon, 2018); (NADP and multiple organisations, 2012).

On a practical basis, Willetts provided no evidence that 133 English HEPs could achieve this level of change in the timescale. Clarke's subsequent postponement, see S.6.1.2.1, within 6 months of Willett's announcement strongly suggests the agenda was driven by imperatives other than practicality.

Nevertheless, the announcement appears to have hastened HEPs' into considering and in some cases implementing technological approaches to meet the withdrawal of some DSA allowances for certain items, for example lecture capture to replace notetakers However, that technology could provide the required support, eg for students physically unable to take notes, those with motor difficulties; being able to review a recorded lecture would not provide notes, recording a poorly structured or delivered lecture would make neither structure nor delivery more accessible. Even though an HEP may have implemented the technology, usage was patchy, academics did not necessarily use it, voluntary opt-outs were commonly reported (Williams, et al., 2019, p. 57).

6.1.1.11. *Summary: Willetts' announcement*

As Willets identified, as the Modernisation's aim was to rebalance responsibilities between Government and HEPs, it might have been useful to provide hard data by way of justification. For example, since tuition fees had been introduced in 1998 (UK Government, 1998) they had provided HEPs with increasing income *vs* Government grants. For England in AY2010/11, of HEPs' total income, 34% derived from tuition fees and 31% from HEFCE disbursements (HESA, 2012). By AY2017/18, such income was 51% and 11% respectively (HESA, 2019c). The rebalance could have been justified as a rational financial response.

However, this initial Modernisation announcement was entirely unexpected by the sector. It proposed removal of significant financial resources, estimated at £24.5m pa (Hubble & Bolton, 2016, p. 10) of £125m spent in AY2011/12 (BIS, 2014a). Additionally, HEPs would need, in only 15 months, to implement significant changes to their teaching and learning to meet their PSED obligations, as reflected in Figure 1.

Additionally, it suggested a requirement to establish a new complexity threshold below which DSA would not be awarded, with a clear absence of how students' SpLDs interacted with their courses and which might give rise to lowered academic attainment. Sector response revealed by this research was that the level of change could not be achieved. Nevertheless, individual HEPs did react to the announcement with a range of initiatives which, at least in part, might have helped them become more inclusive institutions.

6.1.2. Clarke – Modifications to changes (BIS, 2014b)

6.1.2.1. *Announcement intent*

"During the Summer, I and the Minister of State for Disabled People have listened carefully to suggestions from representatives of disabled students. I have also listened to the views and concerns of representatives across the higher education and disability sectors, as well as receiving representations from Honourable Members.

[W]e have agreed to give Higher Education Institutions until the beginning of the 2016/17 academic year to develop appropriate mechanisms to fully deliver their statutory duty to provide reasonable adjustments, in particular non-medical help, and to improve the processes by which disabled students can appeal against a Higher Education Institution's decision that an adjustment would not be reasonable."

6.1.2.2.   Findings of this research

The postponement confirmed this research's findings about the unrealistic original timetable, although there was still no indication of how the extensive changes could be delivered even a year later. No sector initiative was suggested to assist in its operationalisation. The additional £20m pa provided in Disability Premium to help "institutions to transition towards an inclusive, social model of support" came only in AY2016/17, too late to prepare for the revised Modernisation timetable (HEFCE, 2016a, p. 4).

6.1.2.3.   Announcement intent

"For the academic year 2015/16, we will continue to provide Disabled Students' Allowance funding to help with the additional cost of a computer and assistive software…subject to the student contributing the first £200 of the computer's cost."

6.1.2.4.   Findings of this research

This concession was a considerable softening from the original proposals. In the event, the concession was not limited to AY2015/16 but continued beyond, although not subject to an announcement.

6.1.2.5.   Announcement intent

"Additional items such as printers and consumables will not be automatically provided, with alternative provision in the form of university provided services such as printing services and books and journals in electronic format…as alternatives."

6.1.2.6.   Findings of this research

This limitation did not take into consideration a number of issues, eg WP policies encouraged students to enter HE who might have family commitments, health issues or financial constraints which meant they might not attend campus daily, SpLD students typically experience issues with reduced working memory which they mitigated by printing

of documents (Kelly & Phillips, 2011, pp. 31-36); (Cottrell, 2001, p. 105). Limiting study away from campus to screen only without the ability to print at the point of study, due to financial constraints, could be considered indirect discrimination.

6.1.2.7.   Summary: Clark's announcement

The announcement acknowledged two key weaknesses in Willetts' original proposals, as identified by this research and the sector generally, unrealistic timescale and unsupportable withdrawal of parts of DSA. However, there was no waiver on the withdrawal of the bulk of DSAs' benefits.

6.1.3.   Johnson – further modifications and final announcement (BIS, 2015c)

6.1.3.1.   Announcement intent

"I believe HE providers share my ambition for the development of more inclusive learning environments."

6.1.3.2.   Findings of this research

Although a 2017 report (n=137) showed 60% of HEP respondents self-assessed themselves, albeit with no metrics being supplied, as over half way "to providing an inclusive model of support" (Williams, et al., 2017, p. 94), Freedom of Information Requests (FOIR) 1 and 3 showed that HEPs were not developing inclusive curricula as a priority. FOIR2 further showed that ILEs were not well embedded, for example very few HEPs reported that their course validations required a consideration of inclusive teaching practices. This latter need was also identified as a suggestion for improvement by the Disabled Students' Sector Leadership Group (DSSLG) (DSSLG, 2017, p. 27). FOIR2 showed that a majority (62.1%) of HEPs had no agreed definition of inclusive teaching. Notwithstanding the 2017 report, above, WI approaches appeared largely absent, a point emphasised by Office for Students (OfS) which suggested that an indicator be developed to track this element of achieving greater inclusivity (Williams, et al., 2019, p. 5)

With Johnson neither explicitly stating his nor adducing evidence regarding HEPs' ambitions it is difficult to assess the substance of his statement. However, this research suggested that HEPs did not have "sufficient intent to develop and support staff Motivation to embrace inclusive teaching at the institutional level", see S.5.7.3.

6.1.3.3.   Announcement intent

"Higher education providers should increasingly expect disabled students to study with them [hence], the Minister for Disabled People and I can announce that BIS is looking into how it can encourage a sector-led approach to the sharing of good practices in the lead up to the changes and as they bed in."

6.1.3.4.   Findings of this research

Simultaneously with Johnson's announcement BIS published a note to the sector clarifying which support areas it would continue/discontinue to fund which included the statement, "BIS will be working with stakeholders…to consider how best to identify, promote and disseminate best practice in inclusivity, and to encourage HE providers to work collaboratively and pool resources to help meet the requirements of their students" (BIS, 2015f).

The only initiative which might justify the description of a sector-wide approach appears to have been the creation of the DSSLG. However its first, and only, report was not published until January 2017 (DSSLG, 2017), halfway through the changes' first year of operation, in contrast to Johnsons' intent that a sector initiative would be available prior to the changes coming into effect. Additionally, the report whilst presenting material from a range of stakeholders contained no explicit content relating to the students' voice. Further, in this research several HEPs and Inclusivity Officers felt that the report had no impact on their HEP, see S.5.5 and S.5.3. The 'on the ground' experience, therefore, seems to have been, too little, too late, whatever the merits of its published content.

However, as early as 2015 this research showed that an ILE had nine components and eight constraints, see S.5.1. Hence, the information was available from the sector, to inform the sector, had it been researched and disseminated by BIS at that early date. This research later identified eight success factors in developing ILEs, see S.5.3.

In his foreword to the DSSLG report *Inclusive Teaching and Learning as a Route to Excellence* (2017) Johnson stated, "The principles of inclusive practice are well established, as are the benefits that they can bring to students and to state-funded and independent higher education providers." However, FOIR2 showed that this statement was at best optimistic, with fundamental absences in definition, knowledge, training and validation processes. Additionally, a basic source of teaching academics' training, the HEA Fellowship Scheme and its underpinning UKPSF, lacked specific reference to inclusive practices, see S.5.7.3.2.

DSSLG's report contained a somewhat surprising disclaimer reminding the reader that the DSSLG was independent of the DfE, that it was for guidance only and had no legal force nor constituted regulation nor practice, and that the Department for Education (DfE) would not be liable for any decisions taken based on its contents (DSSLG, 2017, p. 4). Disclaimed in this way, this 'sector-led' group's report was neither the ringing endorsement nor leading beacon which Johnson's ambitions for the "development of more inclusive learning environments" might have required or desired for success.

As discussed in S.3.4.20, DSSLG's report framed Inclusive Teaching at the policy level, hence it is hard to see how either might have fulfilled the aspiration of being the best way to "identify, promote and disseminate best practice in inclusivity", however, at least there was some sense of deliverables. Contrastingly, there seems to have been a complete absence of deliverables which encouraged HEPs to "work "collaboratively and pool resources" to help meet their students' needs.

6.1.3.5.   Announcement intent

"Concern was expressed that some institutions were not able to meet their obligations in full by the beginning of the 2015/16 academic year, given their need to invest in additional support for their students. Accordingly changes to non-medical help and accommodation costs were deferred to the start of the 2016/17 academic year, to enable further consultation and additional time for institutions to prepare themselves.

6.1.3.6.   Findings of this research

Johnson confirmed his immediate predecessor's acknowledgement that Willetts' original timetable was unattainable. However, respondents suggested the additional time might still have been insufficient by identifying that the changes increased bureaucracy and caused internal reorganisation, closure or downsize of the disability support function due to projected loss of income, see the immediately following paragraphs. Hence the additional year, far from being dedicated to delivering new services or developing 'more inclusive learning environments', was arguably wasted for some HEPs in having to handle the negative 'fallout' from the changes, see S.5.2 and S.5.4.

6.1.3.7.   Announcement intent

"My predecessor Greg Clark heard views from across the higher education sector… I have undertaken a full public consultation which sought further information on the proposed reforms for 2016/17."

6.1.3.8.   Findings of this research

Studies 4, 5 and 6, see S.5.4, S5.5 and S.5.6, showed that the sector was deeply unhappy about the Modernisation's changes, yet the initial Modernisation announcement occurred with no prior public consultation and it took two consultations after the fact for Johnson to announce the definitive policy. This sequence underlines the importance of working with the sector before announcing changes rather than having to backtrack from proposals in the face of sector response (BIS, 2014c); (BIS, 2015d).

6.1.3.9.   Announcement intent

"DSAs will retain primary responsibility for funding the most specialist non-medical help support, that are set out in the Student Loans Company (SLC) Non-Medical Help (NMH) manual under bands 3 and 4 [bands 1 and 2 reverted to HEP provision]."

6.1.3.10.   Findings of this research

This statement marked a major concession and roll-back from the original proposals. NMH provision had comprised four support Bands reflecting the level of complexity, and therefore qualification, required to discharge the role (SLC, 2016). Hence, the announcement could be regarded as retaining the idea that more complex needs would be

met by DSAs, with the less complex becoming the responsibility of the HEP. In practical terms, it constituted a straightforward way of making some distinction without entering into the 'minefield' of trying to establish a threshold test for SpLDs' complexity. However, despite Bands 1 and 2 reverting to HEP responsibility, as at December 2019, there has been no DfE or HEFCE/OfS follow-up research to determine the extent to which HEPs had replaced the still needed support withdrawn from DSA provision, nor indeed assessment of the Modernisation's changes as implemented (ADSHE, Patoss, UMHAN, 2019)

6.1.3.11.   *Announcement intent*

> "In parallel a new quality assurance framework will be put in place to ensure financial and quality assurance of the provision of non-medical help. The Minister for Disabled People and I expect all disabled students to have access to good quality support and that public funding is managed effectively in the delivery of that support."

6.1.3.12.   *Findings of this research*

Respondents in Studies 2, 4 and 6, see S.5.2, S.5.4, S.5.6, respectively, felt that the introduction of the Non-Medical Help Quality Assurance Framework (NMH QAF) was a significant factor in creating the abovementioned 'fallout' they experienced, They described its requirements as onerous, unnecessary, lacking understanding of the 'real' issues regarding quality provision, subject to frequent changes requiring compliance in unrealistic timescales, and incorporating a rigid and onerous audit (DSA-QAG, 2016a). The QAF was introduced in March 2016 a mere 6 months before 'live-date' in AY2016/17, but full compliance was nevertheless required. Whatever the motives behind its introduction, it was seen by many as significantly flawed and was extremely unpopular to the point of animosity.

A primary concern was that the NMH QAF mandated a change in the way NMH support was nominated in Needs Assessment Reports by allowing independent 3rd party NMH providers to represent that they could support an HEP's students, see Appendix 4, S.10. NMH support delivery, from being HEP managed and therefore co-curricular could become extra-curricular, largely independent of HEPs, therefore beyond their control, making attaining an integrated Inclusive Teaching and Learning (ITL) environment at least problematical and potentially impossible to achieve for any one individual receiving DSA, see S.5.4 and S.5.5. This failing was the paradox at the heart of the new system. It reinforced a drawback of the individualised model, which "locates the 'problem' of disability within the individual" and which by intervention aims "to restore the disabled person to normality", whilst Johnson's 'ambitions', and indeed Willetts original statement's aims, were to move to a more social model to remove the disabling barriers which institutional environments created (Oliver, 1990); (Oliver & Sapey, 2006).

Respondents found other issues with the QAF which hindered, rather than assisted progress to greater inclusivity, see S5.2, S.5.4, S.5.5, S.5.6.

1. Although rescinded after less than 6 months, using Remote Working Tools to deliver NMH support was banned unless explicitly recommended by a Needs Assessor. This policy significantly reduced NMH providers' ability to meet disabled students' needs, potentially removing the possibility of delivering NMH support during students' necessary absences from campus eg placements, study abroad, vacations, family circumstance, health related issues, employment related commitments and reduced financial means. Government Widening Participation (WP) policy identified potential HE students as those with commitments outside their studies such that that daily presence on campus would be unlikely (Newman & Conway, 2017b),

2. The NMH QAF mandated significant additional, time-consuming paperwork and recordkeeping, some was demeaning to students and detracted from tutorial time,

3. Respondents felt that the NMH QAF did little or nothing to quality assure the actual support delivered as seen from students' perspectives,

4. Communications about the changes in general and the NMH QAF specifically were ineffective,

5. 3rd party NMH supply, when not provided via the HEP as a registered NMH provider, meant availability of appropriate space on campus was often removed or placed on a payment basis making it impossible for numerous NMH providers to deliver a service in the QAF mandated "comfortable, confidential, appropriate and suitable for the requirements of the student's support" (DSA-QAG, 2016a, p. 22). Often adequate commercial margin did not exist to allow renting such rooms, eg hourly room rate more than hourly tutoring rate. Even larger providers/agencies did not have premises on or near campuses. Hence, a non-uniform level of service delivery resulted, some delivery perforce breached the QAF, delivering poorer quality for affected students. This issue remained live and unsolved. In March 2020, four years after the NMH QAF was introduced, where one correspondent writing as Head of an HEP Disability Support unit wrote (NADP Jiscmail, 2020):

> "Like others I introduced a charge for suitable rooms, but then found agencies actively avoided paying it by using whatever spaces they could find (or by getting the student to book a room). I dropped the charge and introduced a memorandum of understanding this year so that students were not adversely affected. I do think it unfair that premises are not a requirement for providers of mentoring and study skills." [Originator's permission given to use in this research].

And another, an NMH support worker (NADP Jiscmail, 2020),

> "The universities I provide support in, frankly, do not make it easy for me to meet students in a private space, due to high demand and poor procedures in

getting students out of rooms once their booking has finished, or students just sitting in rooms they have not booked until they are asked to leave by me and my student arriving for a booking. This meant that up to 10 minutes of a session would regularly be lost waiting for a booked room to become available. I have raised this with staff at the university, but nothing has been done and my students tended to get very frustrated with using bookable spaces for this reason. In another university I see students in, NMH workers have been expressly forbidden from using bookable spaces with students apart from a single bookable room in the library for students with a disability to use, however they have to get added to a list to be able to do this, there can be up to 3 sessions taking place in there at once, and it's a very small room." [Originator's permission given to use in this research].

In summary, respondents saw the NMH QAF as inimical to improving the quality of NMH support as viewed by disabled students. These professionals, often lifelong practitioners in delivering NMH support, regarded it as a misguided, highly onerous, costly, bureaucratic and livelihood-destroying box-ticking exercise driven by inflexible people with no understanding of those students' needs.

6.1.3.13.   Announcement intent

"Disabled students will continue to be supported, but we believe that HE providers are better placed to consider how to respond in many cases, including giving greater consideration to the delivery of their courses and how to provide support. The need for some individual support may be removed through different ways of delivering courses and information. It is for HE providers to consider how they make both anticipatory reasonable adjustments and also reasonable adjustments at an individual level."

6.1.3.14.   Findings of this research

Although Johnson conceded that Willetts' primary proposal to remove DSAs, except for students with 'more complex' needs, had been dropped, in his subsequent comments he reiterates the idea that HEPs must determine how to achieve integration between course delivery, student needs and reasonable adjustments via DSAs. However, he provided no clues as to how this integration might be achieved or assisted; he does not mention the DSSLG as a sector-led group which might contribute to this aim, despite his promotion of its aims, in the foreword of the DSSLG's report, just a month later.

6.1.3.15.   Summary: Johnson's announcement

Johnson's announcement constituted the Modernisation as implemented. His concession that Willetts' primary proposal to remove most DSAs had been dropped was somewhat nullified by a highly onerous NMH QAF, including its enforcement of the two-quote system imposing independent 3rd party NMH provision. The NMH QAF was almost universally

unpopular. Additionally, no details were provided of how HEPs might operationally dovetail their institution-based inclusivity initiatives with independent 3rd party NMH support for individuals, a goal felt by some respondents to be difficult to impossible due to HEPs losing visibility and control over support delivered to their own students. Hence, HEPs felt they would not be able to deliver a WI approach, a much stressed success factor in the Australian FYE initiative (Kift, 2015) (Nelson, et al., 2012).

6.1.4. Overall conclusions regarding the DSA Modernisation's three policy announcements

The tumultuous 20 months encompassing Willetts' Clark's and Johnson's statements suggest strongly that it would have been better to formulate a policy in consultation with the affected sector prior to rather than post announcement to avoid negotiating in the glare of the public domain to reach a compromise on timescale and operational substance. Indeed, in both these latter areas the roll-back from the original proposals indicates that these were misguided in both timescale and substance and hindered by lack of sector-involvement. This research and two public Equality Analyses indicate how poorly the original conception was formulated.

Even the final, Johnson, version despite offering a workable compromise contained the 'booby trap' of the NMH QAF which introduced independent 3rd party NMH provision leading to upheaval within HEPs' disability teams, with significant staffing reductions, in numerous cases shutdowns; integration of DSAs with in-house inclusivity programmes became harder to achieve. As previously stated, this latter was the paradox at heart of changes. Additionally, although Ministers and the sector talked about ITL, over half of HEPs had no adopted definition.

One conclusion which may be drawn is that a leadership and information gap existed between policy announcements and operationalisation driven by overestimates of HEPs' progress with ITL and underestimates of the difficulties of implementing it. Hence there follows a 4-stage synthesis of the Dimensions of ITL environments, the structures and linkages which influence the delivery of ITL environments. A final, 5th stage, forms a recommendation by which the sector might fill this leadership and information gap and achieve substantive progress to English Higher Education becoming an ITL environment.

6.2. Structural Analysis - DSA Modernisation and HEPs' moves towards greater inclusivity

HEPs' operationalisation of Inclusive teaching and Learning (ITL)

This section conducts an abductive analysis to answer, "How and to what extent did the Modernisation of DSAs, announced in 2014 and live from AY2016/17, interact with HEPs' efforts to become more inclusive organisations?"

The *Dramatis Personae*, S.2.3 and Figure 2, identified activities acting as exogenous influences on HEPs': Disabilities legislation and administration in HE, HE Legislation and HE Sector Reports and Organisations between 1993-2018. However, these influences did not stand alone, they were both interlinked and acted as triggers for HEPs' own endogenous activities relating to ITL. Additionally, other endogenous activities were revealed by the rich narrative returned with FOIRs1 and 2, S.5.7.

The following synthesis of a 3-dimensional space which captures the interlinked nature of both exogenous and endogenous influences regarding HEP's development of ITL, Schematics 1-4, below, is based upon combining:

1. Ideas from May and Bridger's (2010), Thomas' (Thomas, 2017), Kift's (2015) and McKinsey's 7S (in (May & Bridger, 2010, p. 95)) analytical models regarding the importance of whole organisation approaches,
2. Draffan's et al. (2018) analysis of DSSLG's *Inclusive Teaching and Learning as a Route to Excellence* which refers to the multiple-level exogenous and endogenous national, institutional and professional efforts required to embed ITL,
3. Mountford-Zimdars (2015) analytical model regarding sources of differences in student outcomes,
4. Weller's (2018) strategic, collaborative and individual levels of change implementation,
5. Bowes' et al. (2015) logic trains to identify linkages,
6. Betts' (1992, p. 41) systems thinking and Jackson's (2009) applied systems thinking (AST).

6.2.1. Schematic 1: Overview of dimensions of ITL showing influences

This Schematic identifies influences as belonging to 3 dimensions:

1. The diagonal z-axis (green arrow) identifies exogenous influences (green rounded-corner boxes) on HEPs' ITL activities. This axis includes the categories of the elements shown in S.2.3 and Figure 2; macro-level political and organisational environments, ranging from Governmental policy, through legislation, and regulation to sector-wide training, data collection and evaluation, and facilitation,
2. The vertical y-axis (blue arrow) represents endogenous, meso-level influences (blue rounded-corner boxes) on HEPs' ITL activities, largely resulting from the exogenous

influences. These range from institutional level policy, strategy and structures change management, through faculty and department actions through to hearing the student voice,

3. The horizontal x-axis (orange arrow) captures the endogenous micro-level influences (orange rounded-corner boxes) relating to operationalising ITL; from staff values, attitudes and awareness through to staff putting ITL skills into practice and to further personal development.

Schematic 1: Overview of dimensions of ITL showing influences
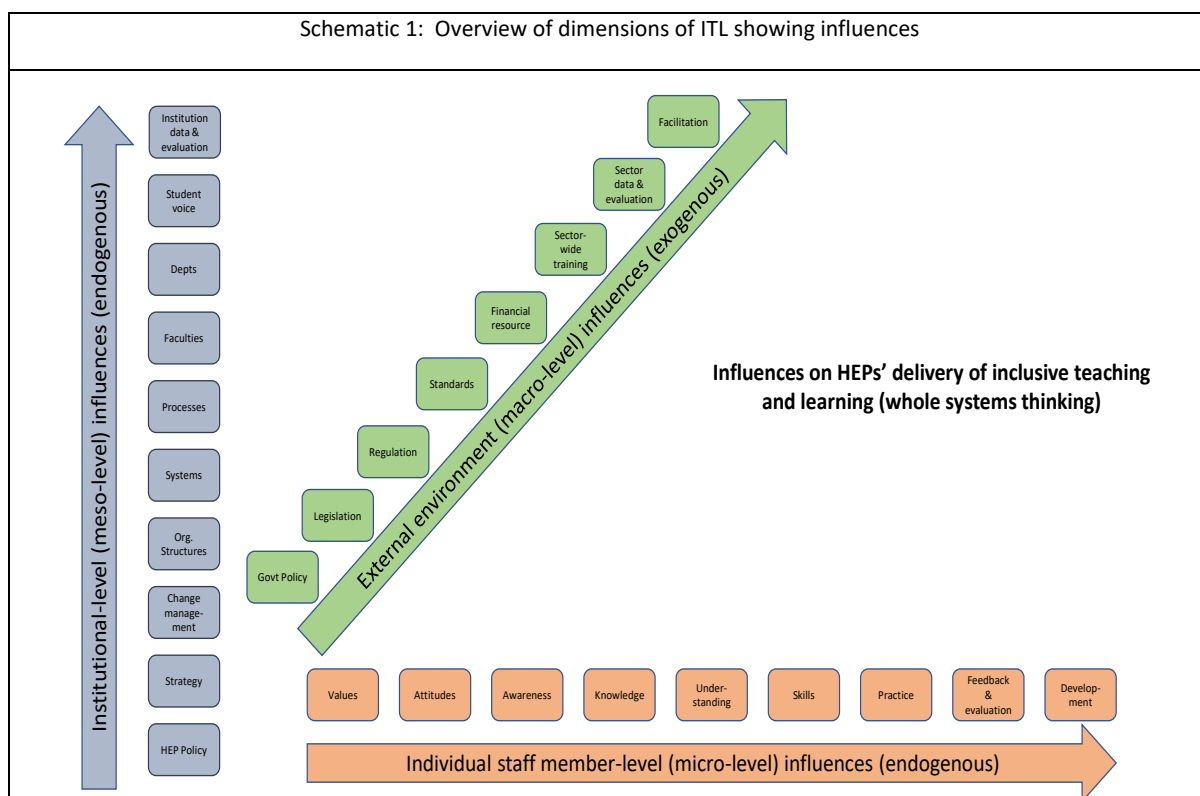
6.2.2.   Schematic 2: Dimensions of ITL showing sources for each influence

For each influence on ITL shown in Schematic 2, a source (right-angle boxes) for the influence is named:

For exogenous, macro-level influences:
1. Widening Participation (WP) is the policy source,
2. The Equality Act (EA) (2010, S. 149) Public Sector Equality Duty is the legislation source,
3. External professional organisations act as the facilitating source.

For endogenous, meso-level influences:
1. Access Agreements constitute the source for HEPs' policy and strategy,
2. Internal student surveys are the source of the student voice,
3. HEFCE/OFFA monitoring returns and teaching Excellence Framework (TEF) submissions are the source of institutional data and evaluation.

For endogenous, micro-level influences:

1. HEP's internal training (Postgraduate Certificate in HE (PGCHE), Continuing Professional Development (CPD)) external training (HEA Fellowship Scheme) and ECU reports constitute the source for staff values, attitudes, awareness, knowledge, understanding, skills, practice and development,

2. ECU reports and HEPs' internal reporting are the sources for feedback and evaluation.

Schematic 2: Dimensions of ITL showing sources for each influence
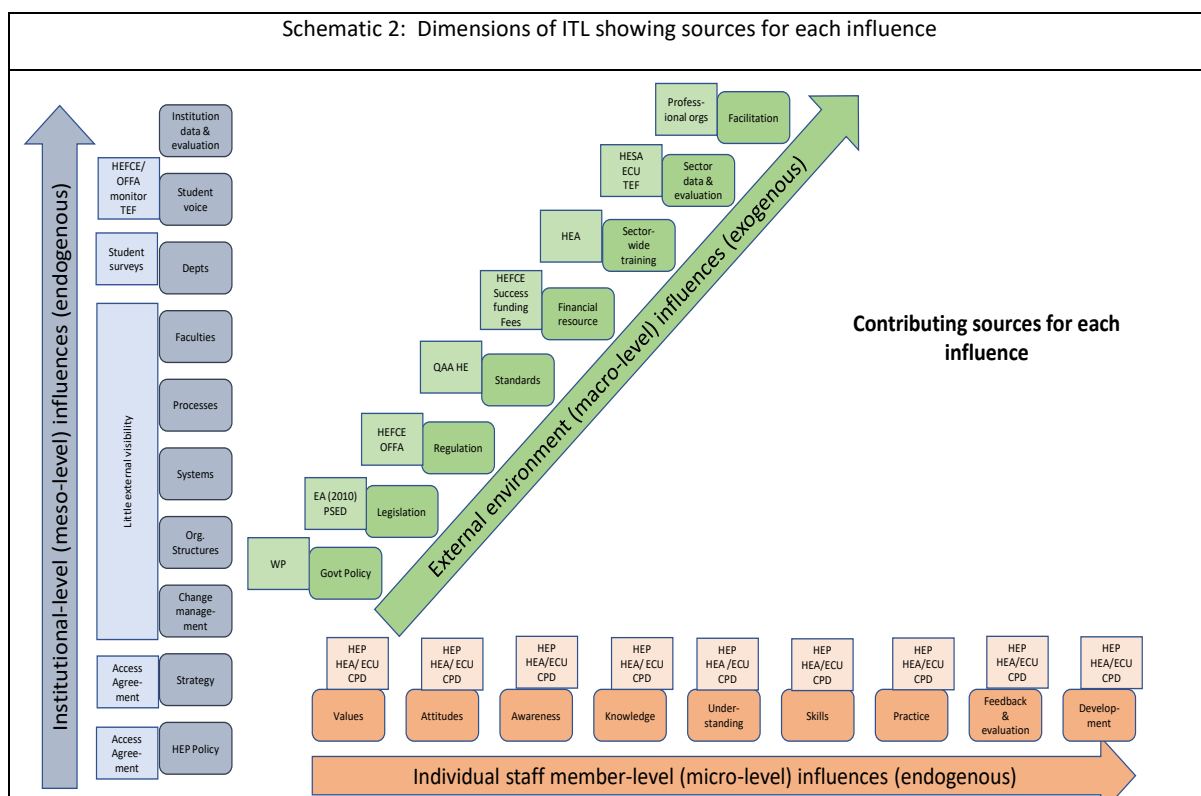
6.2.3. Schematic 3: Cross-relationships - steps identified in this research to operationalise ITL

This Schematic shows steps this research identified as contributing to the operationalisation of ITL. It illustrates an 'idealised' picture of how sector-wide activities might operate together through cross-relationships, linkages, to deliver ITL, for example to address an Equity Group's needs, eg students with SpLDs.

Schematic 3: Linkages - the steps identified in this research to operationalise ITL

Linkages 1-6 - exogenous, macro level: Represent potential 1st order responses, initiated by pre-existing Government policy and legislation, occurring within the macro-level, exogenous environment:

1. Regulation is modified,
2. Quality Assurance (QA) standards for course validations are changed,
3. Financial resource is made available to HEPs,
4. Sector-wide training is designed, made available,
5. Sector data regarding outcomes is gathered, evaluated and published,
6. Operationalisation is facilitated by sector professional associations.

Linkages 7-12 – endogenous, meso-level: Represent potential 2nd order responses, occurring endogenously within HEPs at, meso-level, to modify existing activities:

7. HEPs' policies are reviewed and modified, and Access Agreements amended relating to incorporating ITL,
8. Strategies are reviewed and modified to ensure compliance with increased ITL within the curriculum,
9. Policy & strategy changes lead to change in course/module approval processes,
10. Changed QA standards are incorporated within course approval processes,
11. The curriculum is modified and delivered,
12. Student feedback at module/course/institutional level, is explicitly sought, ideally in each Equity Groups' needs, feeding into sector-wide data and evaluation. This data is also usable in TEF submissions.

Linkages 13-16 – endogenous, micro-level: Represent potential 3rd order responses which influence individual staff members' endogenous, micro-level curriculum delivery. Some HEPs offer PGCHE qualifications or require CPD be undertaken, HEA offers its Fellowship Scheme to academics, Equality Challenge Unit (ECU) conducts and publishes research. More specifically:

13. Sector-wide training from Government-related organisations, eg HEA, incorporates content to address Equity Groups' needs and is made available and delivered,

14. Training from the sectors' professional bodies, also incorporating content to address Equity Groups' needs is made available and delivered,

15. Academics deliver modified curricula to incorporate values, attitudes, awareness, knowledge and skills relating to Equity Groups' needs,

16. Student feedback, sought by course/module, in areas of Equity Groups' needs. The feedback is used in institution and sector data and evaluation, additionally used to develop individual academics' delivery to Equity Groups' needs.

6.2.4. Schematic 4: The steps this research suggests are/are not happening

This research, especially the responses to the FOIRs, suggests that whilst some linkages in the operationalisation of ITL are effective there exist numerous which generally are not, and specifically not for students with SpLDs. Schematic 4 shows where these linkages appear to be happening (✓), appear not to be happening (X) or information was not provided or was equivocal (?).

Schematic 4: The linkages this research suggests are/are not effective
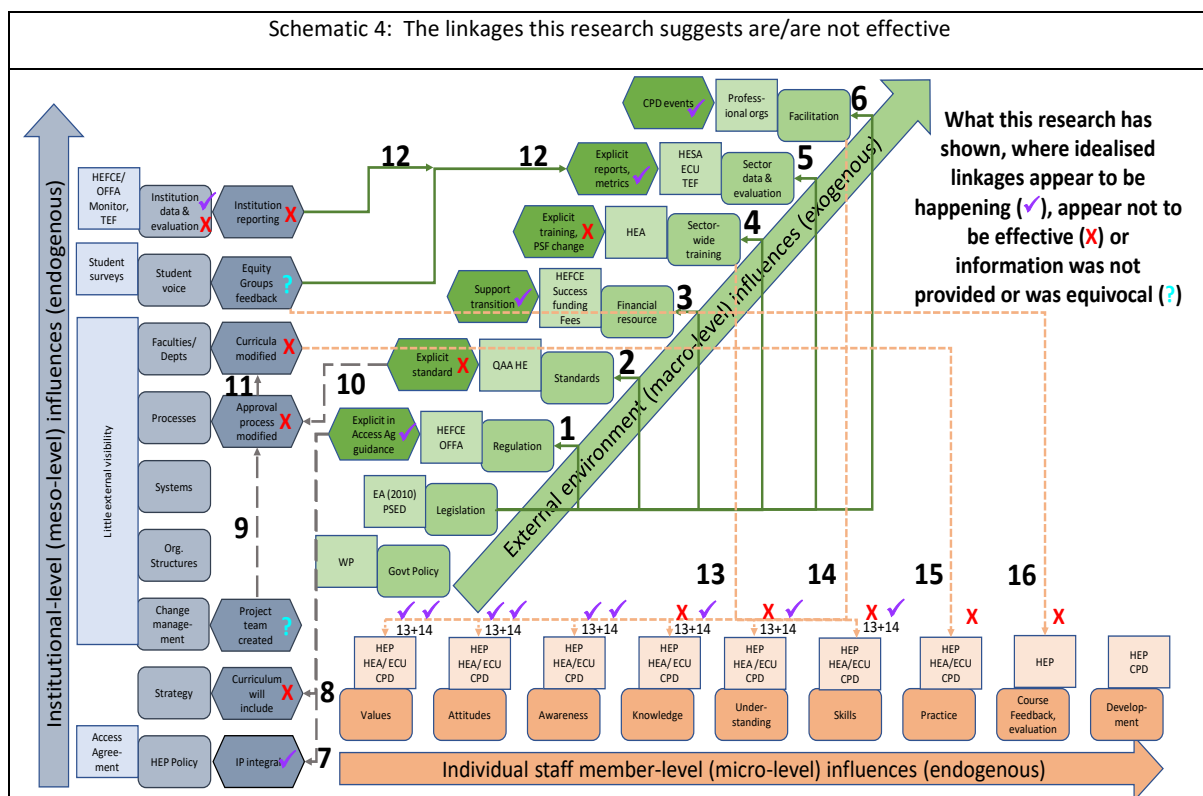
Linkages 1-6 - exogenous, macro level:

1. HEFCE/OFFA required HEPs to outline their plans for ITL in their Access Agreements, but there was no effective monitoring of the results of those plans, an absence implicitly acknowledged by an OfS guidance note regarding AY2020/21, "Regulatory notice 1 sets out how from 2020-21 you will be expected to publish and submit an annual impact report to the OfS detailing progress against targets and commitments made in your access and participation plan" (OfS, 2019d),

2. The Quality Assurance Agency's (QAA) UK Quality Code (UKQC) guidance on course approvals was not changed to refer to ITL,

3. HEFCE provided £20m additional funds pa to support transition to greater ITL, although these monies were not hypothecated to that purpose,

4. HEA's Fellowship Scheme's underlying framework, UKPSF, did not address ITL,

5. HESA collected annual data relating to WP, ECU published various reports relating to WP and specific Equity Groups, the TEF allowed HEPs to submit written narrative about their ITL. See also Linkage 12, immediately below,

6. Professional associations offered information and training via, for example conference presentations and workshops in support of practitioners developing their ITL practice.

Linkages 7-12 – endogenous, meso-level:

7. HEPs' policies addressed ITL through their access agreements,

8. HEPs, as a sector, did not appear to incorporate the operationalisation of ITL into their whole-institution strategies, see S.5.5,

9. Some HEPs managed ITL initiatives through project teams, but evidence of this as a widespread practice was lacking,

10. The QAA UKQC did not require ITL to be addressed explicitly in course/module approval processes, hence HEPs' course/module approval processes did not generally apply robust tests regarding the absence or presence of ITL methods,

11. Some limited initiatives in curriculum delivery had been partially implemented, such as enabling lecture capture, but these were not universally used. Changes to the majority of curriculum content to incorporate ITL had not taken place,

12. To some extent the student voice was heard, for example through the NSS or local initiatives. However, NSS questions did not address students' reactions to ITL nor was analysis published by Equity Group. HEPs reported their 'improvements of inclusivity of teaching and learning' through HEFCE/OFFA monitoring returns but this data was only published at sector level; FOIRs3 and 4 obtained this data at institutional level for AY2016/17 an AY2017/18, respectively. There was no indication institutional data, although collected, was used to inform internal feedback processes,

Linkages 13-16 – endogenous, micro-level

13. Whilst HEA's Fellowship Scheme and underlying UKPSF helped develop values, attitudes and awareness of issues relating to a diverse student body, they did not explicitly address ways to operationalise ITL, a similar gap appeared to be present in HEPs' PGCHE and CPD,

14. Some professional organisations appeared to offer supportive information and training regarding ITL operationalisation, although it is unknown how many academics would have belonged to such organisations, such as the National association of Disability Practitioners (NADP), Staff and Educational development Association (SEDA), to take advantage of their offerings.

15. Without the framework of curricula modified to deliver ITL, academics had little means or opportunity to deliver ITL in their practice, see S.0 and S.5.7.5. HEA's advice that change in attitudes, behaviours and content could only be achieved academic by academic at subject level had not been followed (HEA/Advance HE, 2015), see also S3.4.15,

16. There was no widespread evidence in the research that HEPs used course/module feedback to inform academics' practice of ITL.

6.3. Recommendation – A facilitating organisation for ITL environments

6.3.1. Recapitulation – this research has shown:

6.3.1.1. Through the literature review that:

1. Support offered to disabled students through DSAs was a well-established model, valued by its recipients, and based on the individualised, medicalised model of disability,

2. ITL's context lay within Governments' WP policies, national legislation and a desire to move to the social model of disability,

3. ITL's underlying concepts were widely evidenced, having developed over some two decades, with numerous initiatives at individual or small groups of collaborating English HEPs. Contrastingly, the Australian FYE programme was sector-wide,

4. WI approaches were essential to success,

5. ITL was seen as a route for removing attainment gaps between the different Equity Groups present in HE due to WP.

6.3.1.2. Through the 11 studies:

1. Implementing ITLs takes considerable time, resources and institutional commitment,

2. The Modernisation had significant negative impacts on the DSA support delivery model including:
   a. Downsizing of HEPs' support functions,
   b. Reduction in business flows and income to NMH providers,
   c. Increased bureaucracy,

  d. Breaking the link between HEPs delivery of support to their own students and by so doing making integration between DSA support and HEPs' ITL more difficult, potentially impossible to achieve in practice,

  e. Loss of confidence in and anger with the DfE and its agent the Disabled Students' Allowances Quality Assurance Group (DSA-QAG) regarding the implementation of a quality assurance regime which was seen as inimical to good professional practice in supporting disabled students,

3. An accepted sector-wide definition of and measurement criteria for ITL did not exist,

4. As a sector, HEP's investment in 'improvements in inclusivity of teaching and learning' was a low priority, both in terms of HEP's use of the Disability Premium and their overall expenditure on *improvement of inclusivity of teaching and learning* for disabled students,

5. As a sector, a training gap existed in providing academics with explicit knowledge and skills to deliver their teaching based on Equity Groups' needs,

6. As a sector, HEPs' course/programme validations which included challenging ITL criteria were largely absent.

6.3.1.3.   *Through the analysis in this concluding Section that:*

1. Major gaps existed between Ministers' intent and implementation experience on the ground,

2. Implementing ITL as a sector can be regarded as a multi-dimensional interaction between multiple parties responding to exogenous and endogenous influences operating at macro, meso and microlevels, but without any effective guiding 'mind' or organisation.

Based on these findings ITL has never been 'centre-stage', this peripheral positioning could account for its lack of substantive progress. Hence the recommendation is to create a facilitating organisation, located centrally within current HE-sector structures, such that operationalising ITL environments does become a 'route to excellence', to borrow the title of DSSLG's report (DSSLG, 2017). The working name for the new organisation is the Institute for Inclusive Teaching and Learning (IITL).

6.3.2.   Proposed organisation's profile

Mission: To lead, initially for 10 years, the development and operationalisation of Inclusive Teaching & Learning across the English HE-sector by influencing sector organisations' policies and identifying and disseminating successful operationalisation practice. That leadership would be informed by a whole systems approach in which students' needs and views are paramount.

Positioning: Placed within the OfS, alongside but not part of the Commission for Disabled Students, as the IITL supports the whole student population.

Method:

a. Lead (guide) the sector by consent not coercion, by facilitation not regulation,

b. Appoint acknowledged leaders in the field of ITL to its management,

c. Achieve a commonly adopted definition of ITL, which includes the need to address Equity Groups' individual needs. These needs to be considered in the move to online/virtual teaching, learning and assessment during and post-COVID-19 and the move to online teaching and assessment,

d. Work to 'solve' the problem of integration between DSAs, independent 3rd party NMH supply and HEPs' ITL environments,

e. Work with all elements of the sector to influence and achieve change in their policy and operations to support the implementation of ITL environments, for example QAA, Advance HE, HEPs, professional associations and elsewhere in OfS,

f. Ensure future Equality Analyses include assessments of policies' impacts on progress to ITL environments, with a clear bias towards policies supporting their achievement,

g. Work with OfS to extend the extant HEP Access Agreement and Participation Plan regime to include operationalisation of ITL environments using key performance indicators (KPIs),

h. Formulate a reliable, transparent, broadly adopted tool, incorporating the student voice, which allows HEPs' to measure objectively their progress towards ITL environments, the results of which are regularly published and/or incorporated into a future TEF[45],

i. Offer Fellowships to research and disseminate successful evidence based ITL practice, drawing on the model of Australian FYE and subsequent initiatives,

j. Work with HEPs to encourage WI approaches, especially including their 'front-line' academics, in their adoption of ITL environments,

k. Take a systems approach to understanding the whole sector, placing the 'student' as customer at the heart of future proposals (Dunnion & O'Donovan, 2014).

Schematic 5 shows the influences which the IITL could bring to bear on the other sector parties, items are identified A1-A8, B1-B5 and C1-C4.

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[45] SLC suggested that BIS would consider proposal for a disability-related Charter Mark, but nothing further in the public domain was heard of this proposal (BIS, 2015f). As abovementioned, a Charter for Non-Medical Help Providers had been proposed by the sector in 2012 (NADP and multiple organisations, 2012).

Schematic 5: Placement of IITL within HE-sector structures and its influences
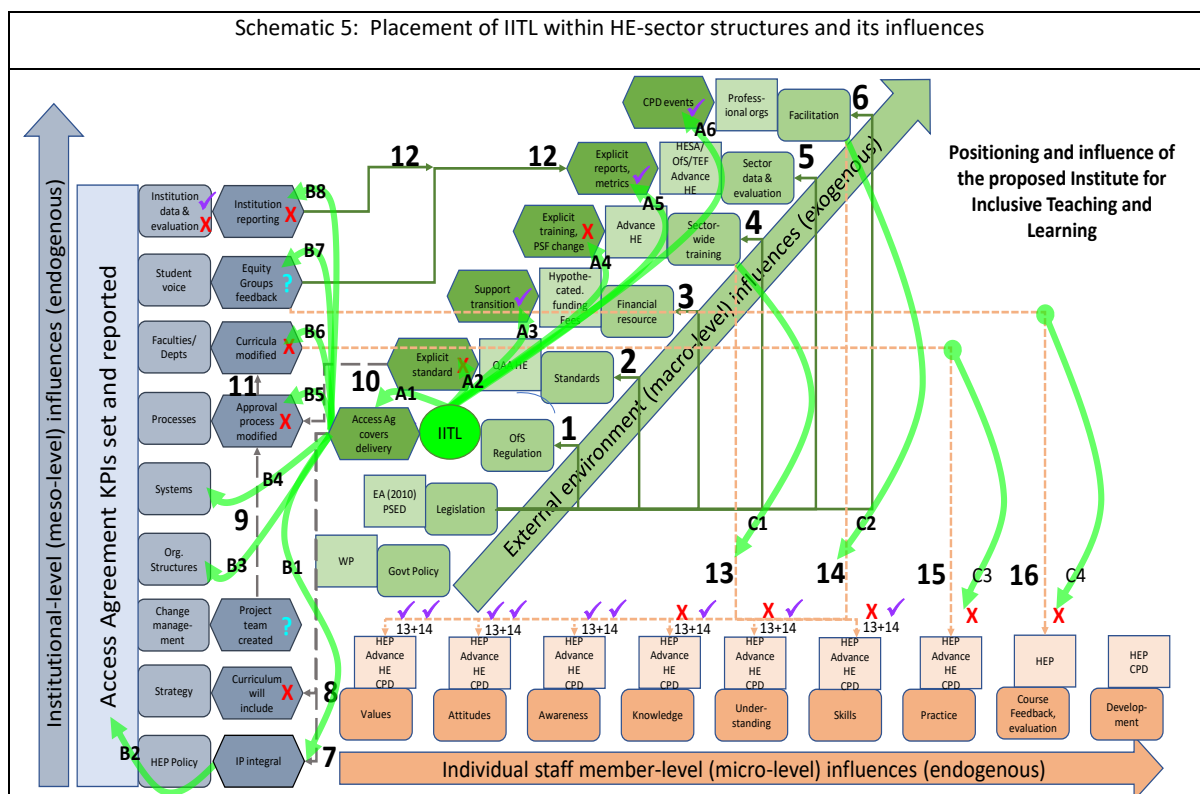
The IITL is positioned within OfS, which from March 2018 was itself placed at the heart of English HE policy, which will give significant influence to IITL's work. This influence feeds through each of the 3 dimensions identified above, turning the areas of non-delivery of ITL environments (red crosses in Schematic 4) into delivery, ultimately achieving mauve ticks in all areas.

Influences A1-A5. Exogenous macro-level:

The organisations in the exogenous environment modify their modus operandi to include the necessary actions to contribute to ITL environments. For example:

A1. QAA incorporates the requirement to validate courses against demanding ITL criteria,

A2. OfS Success, Disability or similar funding is hypothecated to specified outcomes, HEPs are required to report their usage annually,

A3. AdvanceHE modifies the UK professional Services Framework (UKPSF) and its Fellowship Scheme to include the skills to operationalise ITLs, and runs an extended campaign of CPD to retrain existing academics and incorporate ITL material into HEPs' PGCHE for new academics,

A4. HESA gathers and publishes appropriate statistical data relating to the ITL KPIs, see Influence B8, below. OfS incorporates an assessment of HEPs' progress with their KPIs into the TEF. AdvanceHE publishes narrative analytical reports assessing sector progress,

A5. Professional organisations are encouraged to incorporate material regarding operationalising ITL into their offerings and deliver CPD to academics.

Influences B1-B7: Endogenous meso-level

B1. HEPs' modify their Access and Participation Agreements to conform to the Key Performance Indicators (KPI) set by OfS relating to their activities regarding ITL environments, Influence A1, above,

B2. The KPIs become integral to HEPs' operational management,

B3. Organisational structures are reviewed and modified as required to facilitate WI approaches to developing ITL environments,

B4. IT systems are modified both to support gathering KPI data and modified organisation structures,

B5. Course approval process are modified in line with the changed QAA standard, to incorporate demanding ITL criteria,

B6. Curricula are modified to incorporate ITL delivery, based on ideas published by IITL and other sources of HEPs' choice,

B7. Individual Equity Groups participate in annual in-house research to inform HEPs regarding their ITL progress to provide an understanding of the extent to which their ITL environment is meeting each Group's needs, allowing further development of their delivery,

B8. HEPs report their KPI results to HESA and/or OfS (as part of the TEF),

Influences C1-C4: Endogenous micro-level

C1. AdvanceHE delivers an extensive CPD programme, incorporating the operationalisation of ITL environments to existing academics and of working with HEPs on their training for new academics (PGCHE),

C2. Professional organisations deliver ITL training to their members, which would be more specifically subject matter related,

C3. HEPs support their own academics in modifying their curricula, based on a WI approach,

C4. Equity Group feedback informs academics regarding the effects of their changes, allowing further improvements to occur.

Timeliness of IITL proposal

This section examines whether the proposal for an IITL is timely or whether events have overtaken it since the completion of this research's field work in AY2018/19.

OfS (2019a) published an Insight note, intriguingly entitled *Beyond the Bare Minimum: Are universities and colleges doing enough for disabled students?* Based on a commissioned report, it provided:

1. Summary context about disabled students needs in HE, including the Equality Act (2010), social model, and Access and Participation plans,
2. Illustrative examples to support that context,
3. Data showing that employment rate gaps between disabled and non-disabled adults are reduce by the level of highest qualification, although still remained at 15 percentage points (pp) lower for disabled graduates against non-disabled peers,
4. Data showing negative gaps in continuation (0.9 pp), degree attainment (2.8 pp) and progression rates into highly skilled employment or postgraduate study (1.8 pp) between disabled and non-disabled students,
5. A list of nine actions HEPs needed to take "to better support disabled students and progress towards a more inclusive environment".
6. A broad outline of OfS actions taken or envisaged, summarised in Table 94.

Table 94: OfS - Taken or envisaged actions in *Beyond the Bare Minimum: Are universities and colleges doing enough for disabled students* (OfS, 2019a)
1.   Continue to monitor and challenge through access and participation plans
2.   Discuss technical changes with HESA to allow students to declare multiple disabilities
3.   Support TASO, the Centre for Transforming Access and Student Outcomes in Higher Education which aims to help widen participation and improve equality across the student lifecycle (OfS, 2020b)
4.   Help address entrenched barriers to open areas of HE to underrepresented groups
5.   Support Disabled Students Commission to better understand barriers disabled students face
6.   Review approach to teaching funding, including the Disabled Students' Premium
7.   Promote listening to students, full implementation of ITL practices, sector-wide sharing of good practice.

Whilst the Insight alludes to aspects of what might constitute elements of inclusive practice, inclusive teaching and learning, it fails, as apparently does the sector as whole, as this research identified, to define what the terminology means. This omission is compounded by the Insight repeating the unreliable statistic reported in (2017) that "providers scored themselves at 6.2/10 for inclusiveness", see S.3.2.5.1 The Insight makes no suggestions about integrating the support available through NMH provision under DSA with HEPs' inclusive teaching and learning (whether defined or not)

The report states:

> "While universities and colleges have outwardly embraced the social model, they still have much to do if they are to realise full inclusivity for disabled students. Much remains to be done to ensure that disabled students have the same opportunities and experiences as their non-disabled counterparts. The coverage of inclusive pedagogy remains irregular at best…more needs to be done to listen to disabled students' voices."

This statement acts as a useful triangulation for some of the main findings of this research, which act as a basis for the proposed IITL, that:

1. Policy statements have not penetrated deeply into operationalisation,
2. No sector-wide definition of inclusive teaching and learning is agreed,

3. Changes to pedagogy to include practical ways to deliver ITL, as evidenced by what is taught to academics in sector-leading education (HEA Fellowship Scheme, PGCHE, CPD) does not appear to be occurring,

4. Course validations against robust criteria of inclusive teaching and learning are neither specified by QAA UKQC nor widely practiced by HEPs,

5. Funds made available to support HEPs move to inclusive practices/social model were not hypothecated and therefore not necessarily so used,

6. Equity groups' needs are not being widely addressed through the curriculum.

Nevertheless, the Insight provides two useful areas of positive confirmation regarding the idea of a dedicated function centrally placed and/or closely associated with the sector regulator. First, OfS's support for an organisation for Transforming Access and Student Outcomes (TASO) an independent consortium of King's College London, Nottingham Trent University and the Behavioural Insights team (OfS, 2020b), see item 3 in Table 94. TASO aims to "widen participation and improve equality within the sector" through providing "access [to] leading research, toolkits, evaluation techniques" (TASO, 2019). However, it does not appear to aspire to take a leadership position in ITL, thereby running the risk identified by Tinto (2008) that "access without support is not equity". Additionally, OfS, although providing funding until 2022 expects TASO to be financially sustainable thereafter. Second, the creation of the Commission for Disabled Students within OfS, repurposing and expanding the DSSLG, to examine the barriers faced by disabled students in higher education and improve support for them to succeed (OfS, 2019e).

Conversely, the Insight never returns to its title, readers are left wondering whether the OfS considers HEPs are indeed going beyond the bare minimum regarding their disabled students or failing to achieve even that level. Overall, the Insight, as it reflects OfS's position regarding disabled students seems weak in its prescription, unambitious in its goals and lacking in setting a challenge for the sector it regulates.

Hence, in answer the question posed above, the proposal to establish IITL remains timely, it has not been overtaken by significant positive change in the sector. Indeed, this Insight from the sector regulator, reinforces the rationale to establish the Institute.

However, whilst IITL is necessary it is not sufficient to achieve higher and accelerated levels of ITL, for at least two possible reasons, those responsible for delivering IITL and its mission will need operational experience and ability to do so successfully and HEPs will need in parallel to take actions.

The gap between Modernisation policy statements and implementation, its operationalisation, revealed by this research and noted in the above list may, somewhat speculatively, reflect a characteristic of the DfE as part of the British Civil Service. Former Cabinet Office Minister (2010-2015), Lord Maud (UK Government, n.d.), passed scathing criticism, as follows (2020):

"…we still have this tendency to appoint to the head of some organisations in government which have budgets of £10s of billions and huge operational. requirements, we put in charge of them clever civil servants whose background is in the creation of policy. And one of the things I decided to do, when I was minister responsible, was that senior civil servants and certainly permanent secretaries, who were going to be there for a time should all be sent to top business schools in different places to do top management courses. And this was where there was resistance from the leadership of the civil service. But it was eventually kind of reluctantly agreed. And then nothing happened at the end of the time when it should have got underway. One civil servant, one Permanent Secretary, instead of ten of them going off to do three months at Stanford and Harvard and these other top business schools, one of them had done one week in a school in Lausanne in Switzerland. I don't know whether it's a complacency that what the civil service does is so different from what people in business do that there's nothing that the civil service can learn from their counterparts in business."

Could it be that such an absence of operational knowledge within the DfE led to some of the issues revealed by this research? Unfortunately, the level of knowledge and experience possessed by those responsible for the Modernisation policy is not in the public domain, hence this line of thought remains speculative until some future research project were to examine the issue raised by Lord Maud. However, taking his words as a caution, for IITL to be successful its management will need operationalisation capability, as mentioned immediately above.

The next section suggests actions which HEPs might take in parallel to IITL to operationalise their ITL delivery.

6.4.   Recommendation - Potential actions for HEPs to operationalise ITL

Drawing together this study's research results, the Australian FYE initiative's experience and the Dimensional analysis leads to a number of important actions HEPs can, indeed probably should, take to move more quickly and resolutely towards ITL, namely focus on the vertical 'y-axis' of the Dimensions. As endogenous, meso-level influences on ITL they are within HEPs' control. Additionally, actions will be needed to address the endogenous, micro-level influences which taken together determine how each academic staff member delivers ITL at every interaction they have with students, the horizontal 'x-axis'. However, with a heterogenous sector comprising HEPs at various levels of achievement in and progressing at different rates towards ITL, there is no single 'solution' which can be proposed. However, at the very least HEPs should regard the following as a minimum set of recommended operationalising actions in building ITL institutions, but with the caution that these are but the 'tip of a change management iceberg' the detail of which is beyond this research's scope:

1. Define ITL institution-wide and adopt its achievement as a core objective throughout the organisation:
   a. Assign a senior member of the executive team to lead and be responsible for achieving ITL,
   b. Create a cross-functional team, members of which lead specific workstreams. Team members are senior managers drawn from each academic school/department, administrative support services and disability/student support, and members of the student body,
   c. Define what ITL means for each identified Equity Group. Use internal expertise to advise on these Groups' needs. Confirm with representatives of each Group,
   d. Define achievement targets for each Equity Group within a long-term plan,
   e. Include KPI targets and plan in HEP's Access and Participation Plan,
   f. Assign an annual budget,
   g. Establish an HEP-wide communications strategy, including management and progress reporting to all staff, contractors and students,
2. Create, publicise and regularly update the operational plan:
   a. Create short and medium-term prioritised objectives to deliver against each Equity Group's needs, for each of the Dimensions' meso and micro-level elements,
   b. Engage with each element of the Dimensions' meso and micro-level influences to establish an operational plan to achieve the prioritised objectives,
   c. Regularly and frequently communicate the plan and performance thereto,
   d. Regularly and frequently review and update the operation of the plan.
3. Focus on pedagogic and curriculum change:
   a. Identify training requirements to enable staff to deliver on Equity Groups' needs through pedagogy and curriculum design and delivery. Use internal expertise to help identify these requirements, including those at subject level,
   b. Identify likely gaps in each of the micro-level elements and appropriate training to functionally address them,
   c. Plan, deliver and track long term training,
   d. Support the changes to pedagogy through modified PGCHE and CPD including peer support and evaluation,
   e. Regularly and frequently review and update the operation of the pedagogic and curriculum change plan,
   f. Assess the 'on the ground delivery' of the modified pedagogy and curriculum through student feedback, overall and by Equity Group.

Unfortunately, it is beyond the scope of this research to suggest how HEPs might address one element of the endogenous, meso-level elements, managing their organisational

change programmes. Change management is the discipline which manages the 'people side of change' and complements project management which manages project activities (PROSCI, n.d.). Nevertheless some of the above recommendations are drawn from multi-step change management models such as, in alphabetical order, ADKAR (awareness, desire, knowledge, ability and reinforcement) (PROSCI, n.d.), Kotter (increase urgency, build the team, get the vision correct, enlist volunteers, communicate, get things moving, focus on short term goals, don't give up, reinforce/incorporate change) (Kotter Inc, n.d.) and McKinsey 7-S (style, skills, systems, structure, staff, strategy, shared values). Investigating these in the context of HE could be an area for research by IITL.

6.5. Concluding remarks - returning to the original question

This research sought to answer, "How and to what extent did the Modernisation of DSAs, 2014-2018, help or hinder ITL in English HEPs?"

Using Grounded Theory and associated strategies plus an abductive approach, the Studies 'listened' as respondents told their stories in semi-structured interviews and questionnaires supplemented by information from HEPs, HEFCE/OFFA and OfS gathered by FOIRs. Qualitative responses were analysed thematically, then reanalysed to identify possible linkages. This concluding section also applied a further analysis of Ministers' announcements *vs* the changes as they played out on the ground leading to the Dimensions of influence regarding ITL environments resulting in a firm recommendation.

The initial announcement caused dismay in the sector and led to HEPs investigating IT solutions to help plug the anticipated gap left by the withdrawal of a sizeable portion of DSAs a mere 15 months hence. The sector's disquiet, when communicated to BIS (and DfE) led to two Equality Analyses which each resulted in a pull-back in severity from the original proposals. Nevertheless, some IT solutions were implemented by HEPs, but not universally used even where implemented. Additionally, some HEPs pressed ahead with the operationalisation of and training in ITLs, with or without a definition of ITL. However, developing and implementing inclusive curricula appeared a mid to low priority for many.

With the Modernisation as implemented, the imposition of a QAF which enforced the two-quote system imposing independent 3rd party NMH provision on the sector, it became more difficult for HEPs to know what NMH support was being given to some or all of their students making it problematical for HEPs to provide an integrated ITL environment. The QAF also reinforced the medicalised aspects of the individualised model of disability making achievement of a social model more doubtful. DSAs and ITL environments, whilst both supporting students in their educational needs, remained largely ununified, to student detriment.

Minister's aspirational statements for the implementation of ITL environments rang hollow, they were not accompanied by practical support to HEPs in their achievement. The end was

willed, but not the means. Monies were, however, available to aid progress towards ITL environments but not hypothecated, leading to their use in other, albeit associated areas.

This research concludes that the Modernisation of DSAs had a significantly negative influence on progress towards ITL environments in English HE and recommends the creation of an Institute for ITL (IITL), located within the OfS "to lead, initially for 10 years, the development and operationalisation of ITL across English HE by influencing sector organisations' policies and identifying and disseminating successful operationalisation practice." An objective of that leadership would be to achieve the tipping point in ITL , "the moment of critical mass…at which the momentum for change becomes unstoppable" (Gladwell, 2000) in (May & Bridger, 2010, p. 91).

The aspiration is that the IITL, or something very similar, reaches and progresses beyond that tipping point giving future disabled students a barrier-free HE environment, as illustrated in Figure 32, supporting rather than hindering their aspirations, where they do not have to fight for their rights to reach their academic potential. Indeed, any definition of inclusive teaching and learning would benefit from an explicit reference to barrier removal. This research project therefore closes with a proposed modification (highlighted text), to Prof Hockings (2010) definition and commends its wide acceptance across the sector:

> Inclusive learning and teaching in higher education refers to the ways in which pedagogy, curricula and assessment are designed and delivered to engage students in learning that is meaningful, relevant and accessible to all. It embraces a view of the individual and individual difference as the source of diversity that can enrich the lives and learning of others. ***It is operationalised by the active identification and removal of barriers to learning experienced by different Equity Groups.***

Figure 32: Removing barriers to achieve inclusivity

Traditional HE (This is the way it is)

Individualised support (DSA, medical model)

Responding to Equity Groups' needs allows barrier removal (ITL, social model)
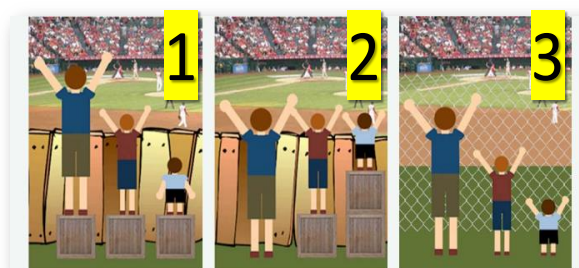
(Source: Advancing Equity & Inclusion.
A Guide for Municipalities © CAWI)

7. Appendix 1: Ministerial Statements Regarding DSA Changes

April 7th, 2014: Rt Hon David Willetts, Minister of State for Universities and Science (BIS, 2014a)

Today I am announcing measures to modernise the Disabled Students' Allowances, which are available to Higher Education students from England.

Disabled Students' Allowances (DSAs) are non-repayable grants that assist with the additional costs that a disabled student incurs in relation to their study in higher education. DSAs currently provide a range of support. This includes the purchase of laptops and specialist equipment, provision of support workers and assistance with additional travel costs. The support is not means tested and is available for eligible full-time and part-time students, studying at undergraduate and postgraduate level.

In 2011 to 2012 DSAs provided over £125 million of additional support for over 53,000 full-time undergraduate higher education students, compared with £91.7 million awarded to 40,600 students in 2008 to 2009.

I announced earlier this year that maximum grants for full-time, part-time and postgraduate students with disabilities will be maintained at 2014 to 2015 levels in 2015 to 2016.

I am announcing a number of changes aimed at modernising the current system, subject to the Equality Impact Assessment. This will ensure that the limited public funding available for DSAs is targeted in the best way and to achieve value for money, whilst ensuring those most in need get the help they require.

DSAs have been available since 1974, with the 4 separate allowances being introduced in 1990. The current arrangements do not recognise technological advances, increases in use of technology or the introduction of the Equality Act 2010. It has been almost 25 years since the DSA scheme was reviewed, unlike other areas of student support.

The proposals outlined below look to rebalance responsibilities between government funding and institutional support. We will look to HEPs to play their role in supporting students with mild difficulties, as part of their duties to provide reasonable adjustments under the Equality Act. These are partly anticipatory duties and we expect HEPs to introduce changes which can further reduce reliance on DSAs and help mainstream support. We will be consulting with specialists in the sector to ensure that Specific Learning Difficulties (SpLD) students understand the type of support they can expect to receive and who will provide it.

We recognise that students will continue to need support. However, we believe that HEPs are better placed to consider how to respond in many cases, including giving greater consideration to the delivery of their courses and how to provide support. The need for some individual non-medical help (NMH) may be removed through different ways of

delivering courses and information. It is for HEPs to consider how they make both anticipatory reasonable adjustments and also reasonable adjustments at an individual level.

The key changes are set out below:

We will pay for higher specification or higher cost computers where a student needs one solely by virtue of their disability. We will no longer pay for standard specification computers or the warranties and insurance associated with them. We will no longer pay for higher specification and/or higher cost computers simply because of the way in which a course is delivered. We are changing our approach to the funding of a number of computer equipment, software and consumable items through DSAs that have become funded as 'standard' to most students.

Students with Specific Learning Difficulties will continue to receive support through DSAs where their support needs are considered to be more complex.

We will fund the most specialist Non-Medical Help. HEPs are expected to consider how they deliver information to students and whether strategies can be put in place to reduce the need for support workers and encourage greater independence and autonomy for their students.

The additional costs of specialist accommodation will no longer be met by DSAs, other than in exceptional circumstances.

We are also clarifying a number of policy changes. We will define disability in relation to the definition provided by the Equality Act 2010, for the purposes of receiving DSAs. We will also introduce a requirement for registration for those providers offering DSA study needs assessments and DSA assistive technology service providers.

The changes will ensure DSAs provide support where it is needed the most.

The changes in this statement will apply to all full-time, full-time distance learning, part-time and postgraduate students applying for DSA for the first time in respect of an academic year beginning on or after 1 September 2015. This provides sufficient time for us to work with institutions and stakeholders to ensure the changes are introduced effectively.

Existing DSA students and DSA students for 2014 to 2015 entry will remain on the current system of support for 2015 to 2016.

September 12th, 2014: Rt Hon Greg Clark, Minister of State for Universities, Science and Cities (BIS, 2014b)

Student Support

In a Written Ministerial Statement on 7 April 2014 the then Minister for Universities and Science announced proposed changes to Disabled Students' Allowances which are available to Higher Education students from England.

Disabled Students' Allowances are non-repayable grants that assist with the additional costs incurred by disabled students in relation to their study in higher education. Disabled Students' Allowances finance a range of support, including the purchase of computers and specialised equipment, assistance with travel costs and the provision of support workers where necessary. In 2011/12 Disabled Students' Allowances provided support of over £144 million to 61,000 students, funded from the Higher Education Budget. Disabled Students' Allowance continues to be available to support disabled students studying in higher education.

During the Summer I and the Minister of State for Disabled People have listened carefully to suggestions from representatives of disabled students. I have also listened to the views and concerns of representatives across the higher education and disability sectors, as well as receiving representations from Honourable Members.

We are determined to ensure that disabled students should be able to make use of and develop their talents through higher education and that there should be no cap on their aspirations.

There was widespread agreement that universities should discharge their duties under the Equality Act to make reasonable adjustments to accommodate disabled students, as other organisations do. However, concern was conveyed that some universities may not be able to meet their obligations in full by the beginning of the 2015/16 academic year, given their need to invest in additional support for their students.

With students applying now for places at the beginning of that year it is important that any disabled student should be confident that an institution to which they are considering applying will be able to meet their needs satisfactorily.

Accordingly we have agreed to give Higher Education Institutions until the beginning of the 2016/17 academic year to develop appropriate mechanisms to fully deliver their statutory duty to provide reasonable adjustments, in particular non-medical help, and to improve the processes by which disabled students can appeal against a Higher Education Institution's decision that an adjustment would not be reasonable. We will explore how this might be supported in institutions' Access Agreements with the Office for Fair Access for 2016/17.

For the academic year 2015/16, we will continue to provide Disabled Students' Allowance funding to help with the additional cost of a computer and assistive software if needed

solely because of the student's impairment. This will be subject to the student contributing the first £200 of the computer's cost – broadly equivalent to the cost of a basic computer. For future academic years we will explore a bulk purchasing scheme for such computers to keep costs down. Additional items such as printers and consumables will not be automatically provided, with alternative provision in the form of university provided services such as printing services and books and journals in electronic format to be considered as alternatives.

Funding will remain available towards the additional costs of specialised accommodation for disabled students, other than where the accommodation is provided by the institution or an agent of the institution. A number of commentators made proposals to streamline the assessment process for Disabled Students' Allowance to reduce the burden for students, universities and the taxpayer. The Minister of State for Disabled People and I will invite representatives to consider how that might be achieved.

The changes summarised in this Statement other than non-medical help changes will apply to all full-time, full-time distance learning, part-time and postgraduate students applying for Disabled Students' Allowances for the first time in respect of an academic year beginning on or after 1 September 2015. This provides sufficient time for us to work with institutions and stakeholders to ensure the changes are introduced effectively. All changes are subject to the ongoing Equality Analysis. Continuing students already claiming Disabled Students' Allowances and students claiming for 2014/15 entry will remain on the current system of support for 2015/16.

We are grateful to universities, students and their representative bodies for their assistance in informing these changes.

December 2nd, 2015: Rt Hon Jo Johnson Minister of State for Universities and Science (BIS, 2015b)

Today I am announcing the Government response to a consultation on better targeting of Disabled Students' Allowances (DSAs), which are available to Higher Education students from England.

Disabled Students' Allowances are non-repayable grants that assist with the additional costs that a disabled student incurs in relation to their study in higher education. DSAs currently provide a range of support. This includes the purchase of specialist equipment, provision of support workers and assistance with additional travel costs. The support is not means tested and is available for eligible full-time and part-time students studying at undergraduate and postgraduate level.

I am determined to ensure that disabled students should be able to make use of and develop their talents through higher education and that there should be no cap on their aspirations. Ensuring that disabled people can access higher education is an important part of cutting the disability employment gap. I am extremely pleased that we have seen a rise in disabled students accessing higher education.

In 2012/13 DSAs provided £145.8 million of additional support for 64,500 disabled higher education students, compared with £101.3 million awarded to 47,400 students in 2009/10, a rise of around 44%.

A review of the DSAs scheme has been long overdue, and the rationale for reform has been the subject of two previous Statements. The DSAs system has been in its current form for nearly 25 years. The current arrangements do not recognise technological advances, increases in use of technology, or the introduction of the Equality Act 2010, which placed specific legal duties on higher education providers. The rise in the number of disabled students in higher education highlights the need for better provision of inclusive practices. My predecessors therefore announced a programme of reform of DSAs in April 2014 and September 2014.

There is widespread agreement that higher education providers should discharge their duties under the Equality Act to make reasonable adjustments to accommodate disabled students, as other organisations and businesses do. I believe HE providers share my ambition for the development of more inclusive learning environments. The increasing numbers of disabled students entering HE is to be celebrated, as is the increasing numbers of those declaring their disability. However, it is possible that the continued provision of DSAs may have removed the urgency of some HE providers to expand provision for all disabled students. Higher education providers should increasingly expect disabled students to study with them and strive to ensure that those students have equal access to their learning. In recognition of this and the great work that some HEPs have already done to meet this end, the Minister for Disabled People and I can announce that BIS is looking into

how it can encourage a sector-led approach to the sharing of good practices in the lead up to the changes and as they bed in.

The Government's intention is that DSAs will remain available to support those disabled students who require additional help, but should complement the support put in place by HE providers to help all disabled students. Some reforms have already been implemented, with changes made to the funding of computer equipment from the academic year 2015/16.

My predecessor Greg Clark heard views from across the higher education sector and received representations from Honourable Members, and he and the previous Minister of State for Disabled People heard views and concerns from representatives of disabled students. Concern was expressed that some institutions were not able to meet their obligations in full by the beginning of the 2015/16 academic year, given their need to invest in additional support for their students. Accordingly changes to non-medical help and accommodation costs were deferred to the start of the 2016/17 academic year, to enable further consultation and additional time for institutions to prepare themselves.

I have undertaken a full public consultation which sought further information on the proposed reforms for 2016/17, and which set out the Government's preferred options. I have considered the responses to the consultation, and have properly considered the Equality Analysis. The Minister for Disabled People and I can now announce that the original Government proposal will now be implemented from 2016/17, but further engagement with stakeholders will be undertaken to identify whether exceptions to the general rules for non-medical help (NMH) should be considered.

These changes will ensure that the limited public funding available for DSAs is targeted in the best way and to achieve value for money, whilst ensuring those disabled students most in need continue to get the help they require. They also aim to ensure that Higher Education providers all properly adhere to their Equalities Act 2010 duties, which is to the benefit of all disabled students.

The changes set out below seek to rebalance responsibilities between government funding and institutional support. We expect HE providers to play an increasing role in supporting all disabled students and are asking them to take primary responsibility in a number of areas. Disabled students will continue to be supported, but we believe that HE providers are better placed to consider how to respond in many cases, including giving greater consideration to the delivery of their courses and how to provide support. The need for some individual support may be removed through different ways of delivering courses and information. It is for HE providers to consider how they make both anticipatory reasonable adjustments and also reasonable adjustments at an individual level.

DSAs will continue to retain primary responsibility for certain types of support, and will continue to be available across the range of support, where an adjustment by the HE provider may not be considered a reasonable adjustment.

The key changes, which will take effect from academic year 2016/17, are set out below:

DSAs will retain primary responsibility for funding Sighted Guides, for those students that need such support to enable them to get around campus effectively. HE providers will be expected to take primary responsibility for the remainder of the non-medical support roles that are classified as bands 1 or 2 in the Student Loans Company non-medical help (NMH) manual. We will seek further information from stakeholders, including from disabled students and their representatives, on whether specific exceptions to this general rule should apply. In addition, HE providers are expected to consider how they deliver information to students and whether strategies can be put in place to reduce the need for support workers and encourage greater independence and autonomy for their disabled students.

DSAs will retain primary responsibility for funding the most specialist non-medical help support, that are set out in the SLC NMH manual under bands 3 and 4, with the exception of Specialist Transcription Services. HE providers will be expected to take primary responsibility for the provision of Specialist Transcription Services, other than by exception.

DSAs will meet the additional costs of accommodation where that accommodation is not provided by the HE provider or its agent. DSAs funding will not be available where specialist accommodation is provided by the HE provider or their agent, other than by exception. HE providers should no longer pass any additional costs for accommodation onto the student.

Devices for printing and scanning will continue to be funded through DSAs. However, HE providers are expected to strive to meet the needs of their disabled students to reduce the need for the purchase of individual devices for printing and scanning. The assessment process will be more robust and individual devices will only be funded if the need cannot be met through other measures.

Standard computer peripherals and other accessories will now be funded by exception only. Laptop carry cases will continue to be provided as standard to help students protect their equipment.

The Minister for Disabled People and I are passionate about the importance of ensuring that disabled students can fully participate in higher education. Recognising that there is an implementation journey to undertake, an Exceptional Case Process will be put in place to respond to cases where the individual circumstances mean that an institution does not provide the support that is expected, or the needs of the student are such that it may not be reasonable to expect the institution to provide the support in the individual case. The Exceptional Case Process will be monitored to ensure that it remains timely, robust and fit for purpose.

In parallel a new quality assurance framework will be put in place to ensure financial and quality assurance of the provision of non-medical help. The Minister for Disabled People and I expect all disabled students to have access to good quality support and that public funding is managed effectively in the delivery of that support. Changes to the way equipment will be purchased in the future are also being explored, to ensure value for money is achieved in this area.

The changes in this Statement will apply to all full-time, full-time distance learning, part-time and postgraduate students applying for DSAs for the first time in respect of an academic year beginning on or after 1 September 2016.

Existing DSAs students and DSAs students for 2015/16 will remain on their existing system of support for 2016/17.

We are grateful to all those who have engaged for their assistance in informing these changes.

8. Appendix 2: Definitions and descriptions of SpLDs

Dyslexia (Rose, 2009); (BDA, n.d.)

Dyslexia is a learning difficulty that primarily affects the skills involved in accurate and fluent word reading and spelling. Characteristic features of dyslexia are difficulties in phonological awareness, verbal memory and verbal processing speed. Dyslexia occurs across the range of intellectual abilities. It is best thought of as a continuum, not a distinct category, and there are no clear cut-off points. Co-occurring difficulties may be seen in aspects of language, motor co-ordination, mental calculation, concentration and personal organisation, but these are not, by themselves, markers of dyslexia. A good indication of the severity and persistence of dyslexic difficulties can be gained by examining how the individual responds or has responded to well-founded intervention.

Description of dyslexia and dyslexia's effects in HE (Selected for their comprehensive succinctness (Webster, 2016). Sources referenced by Webster: (Goode, 2007)**;** (Mortimore & Crozier, 2006)**;** (Madriaga, 2007)**;** (Vickenham & Blundell, 2010)**;** (Taylor, et al., 2009)**;** (Mullins & Preyde, 2013)**;** (Brante, 2013)**;** (Stienen-Durand & George, 2014)**;** (Olofsson, et al., 2012)**;** (Plakopiti & Belou, 2014)**;** (Reid, et al., 2013)**;** (Bjorkland, 2011)**;** (Tops, et al., 2012); (Kinder & Elander, 2011); (Elliot, 2014); (Macdonald, 201)

> **Description:** "Dyslexia includes cognitive, organizational, analytical, attention, concentration and synthesis difficulties. Difficulties in information processing, working memory and motor skills affect reading, spelling, speech, writing, numeracy and behaviour increasing anxiousness, frustration and embarrassment. Dyslexic students also have problems with memorisation, sequences, time keeping, concentration and word tasks so work becomes disjointed due to problems remembering sequential information. Dyslexic students should be taught to understand the whole concept to encourage deeper learning and to be more spontaneous to develop a learning style where support should be tailored. Dyslexic students do not have less general intelligence, problem solving and reasoning skills or visual memory. Dyslexia has a common underpinning involving weak phonological and orthographical coding including manifestations individual to each person. Phonological and orthographical decoding also present difficulties with the written letters in words, the associated sound and what the word means. Phonological difficulties include pronunciation problems causing embarrassment affecting self-confidence and increasing anxiety. Dyslexic students think holistically offering creative and innovative solutions helping to compensate for their weaker phonological and auditory capacity. Learning environments should be adapted by lecturers to suit dyslexic students which would not necessarily disadvantage a non-dyslexic student."

Dyslexia effects in HE

"Attending university is an initial step for students to form their individual and social identity. Students feel anxious of stigmatisation that they may be perceived as unintelligent impacting their student identity. Dyslexic students pursue H.E. to promote self-worth and improve future employability and earning potential. They can find the transition to university stressful and difficult due to a lack of direction, worldly knowledge and not knowing how they will be assessed and what attitudinal and disability awareness barriers they may face. Dyslexic students have difficulties that include: notetaking; planning and writing assessments; written expression and grammar]; reading and understanding new terminology; grasping the main concepts of text revising; communicating knowledge in examinations; forgetting names and facts even if familiar; meeting deadlines and personal organisation. They can develop work avoidance tactics to disguise difficulties which become exacerbated over time. Dyslexic students have difficulty understanding inferences from the written word and tend to conceptualise information in a visuospatial manner. To read, a person must simultaneously process text visually, phonologically and semantically which puts pressure on working memory. Extensive reading and writing for university requires high level skills of fluency which can induce stress. In H.E. the written word is privileged and meritocratic and standard forms of assessment and evaluation practice disadvantage dyslexic students. Writing is influenced by long term memory and to write academically students utilise multiple cognitive processes which depend on working memory."

Dyspraxia (SASC, 2013)

Definition of Developmental Co-ordination Disorder Developmental Co-ordination Disorder (DCD), also known as Dyspraxia in the UK, is a common disorder affecting fine or gross motor co-ordination in children and adults. This lifelong condition is formally recognised by international organisations including the World Health Organisation. DCD is distinct from other motor disorders such as cerebral palsy and stroke and occurs across the range of intellectual abilities. Individuals may vary in how their difficulties present; these may change over time depending on environmental demands and life experience.

An individual's co-ordination difficulties may affect participation and functioning of everyday life skills in education, work and employment. Children may present with difficulties with self-care, writing, typing, riding a bike and play as well as other educational and recreational activities. In adulthood many of these difficulties will continue, as well as learning new skills at home, in education and work, such as driving a car and DIY.

There may be a range of co-occurring difficulties which can also have serious negative impacts on daily life. These include social and emotional difficulties as well as problems with time management, planning and personal organisation and these may also affect an adult's education or employment experiences.

To reach a conclusion of DCD/dyspraxia the assessor must provide evidence of a history of motor co-ordination difficulties, and it is vital therefore that a detailed case history is taken (including difficulties as a child). The assessor should explore these using an in-depth interview and/or questionnaire. The assessor can therefore form an opinion about these based on the student's responses. An assessor needs to take account of both the physical and educational aspects of DCD/dyspraxia. As noted in the definition there may well be co-occurring difficulties. It may be these co-occurring difficulties that are the dominant issues, particularly when working with young adults. Issues of poor motor coordination, in general, do not impact on educational achievement to the same extent that cognitive factors do [and may for the most part have already been addressed when looking at adults].

If the primary needs of the student are largely educational rather than physical, an assessment of individuals age 16 or older, carried out by an appropriately trained practitioner psychologist or specialist teacher assessor which looks at educational strengths and weaknesses would be appropriate and can identify dyspraxia. Such an assessment should provide advice on educational intervention and support and suggest appropriate educational adjustments. [Note: It is very important that children with motor coordination difficulties be recommended to be seen by a medical practitioner.]

Information which can be gained from detailed case history includes:
1. Lateness in reaching milestones of childhood
2. Gross motor co-ordination skills (questions about posture/fatigue/balance/hand-eye co-ordination/integration of two sides of the body/rhythm)
3. Fine motor co-ordination skills (questions about manual dexterity and
4. Manipulative skills)
5. Organisational skills
6. Speech (questions about organising the content and sequence of their speech/word pronunciation/word retrieval)
7. Sensitivity to light, noise, touch and smell
8. Social interaction
9. Emotional difficulties
10. Daily living difficulties
11. Obsessional behaviours
12. Orientation and sequencing
13. Tracking
14. Visual perception
15. Spatial awareness
16. Sense of time
17. Sense of direction
18. Accuracy
19. Concentration
20. Memory

Assessors working with adults should follow the usual process for an SpLD assessment choosing appropriately from the battery of tests in the DfES Guidelines as updated by STEC/SASC.

It would be expected that visual-perceptual skills and fine motor skills tests would be included.
1. Planning and spatial ability difficulties can be highlighted through the
2. non-verbal tests from the WAIS-IV or the WRIT.
3. Motor co-ordination difficulties highlighted through the Symbol Digit Modalities Test and processing speed tests from the WAIS-IV
4. Specific tests of motor skills such as the Beery Buktenica
5. Developmental Test of Visual-Motor Integration and the DASH17+
6. In addition, there is also likely to be slower than average information processing (oral or written) so tests of reading speed, writing speed and naming are useful.

Deteriorating motor function or deterioration in a skill in the past 6-12 months in anyone should alert assessors to encourage the individuals to see their doctor for further assessment. There are some aspects of dyspraxia that only health professionals can assess such as motor control and co-ordination, poor muscle tone and skeletal abnormalities. Where a medical diagnosis of DCD is made the individual [or parent/guardian for children] should be made aware that there might be accompanying educational difficulties. All professionals identifying DCD/dyspraxia should note that there can be impacts on other aspects of life.

Dyscalculia (SASC, 2019)**.** For effects of dyspraxia in HE and suggested teaching adaptations see (Portwood, 2000, pp. 143-144)**.**

Dyscalculia Definition Dyscalculia is a specific and persistent difficulty in understanding numbers which can lead to a diverse range of difficulties with mathematics. It will be unexpected in relation to age, level of education and experience and occurs across all ages and abilities.

Mathematics difficulties are best thought of as a continuum, not a distinct category, and they have many causal factors. Dyscalculia falls at one end of the spectrum and will be distinguishable from other mathematics issues due to the severity of difficulties with number sense, including subitising, symbolic and non-symbolic magnitude comparison, and ordering. It can occur singly but can also co-occur with other specific learning difficulties, mathematics anxiety and medical conditions.

ADHD (SASC, 2013)

Previous guidance stated that ADHD required a medical diagnosis by a doctor; usually a child and adolescent psychiatrist, a paediatrician, paediatric neurologist or a general practitioner, trained in the diagnosis and treatment of ADHD. However, there are several students every year who report and present with very great difficulties with attention span, concentration,

forgetfulness and organisation, resulting from ADHD. Consequently, they are struggling with their studies. In many cases they have not been previously diagnosed or were diagnosed during childhood with no further information on their current diagnostic status.

The waiting lists for medical referrals are variable and very long in many parts of the country; and some regions still do not provide a diagnostic or treatment service for adults with ADHD. ADHD is a neurodevelopmental disorder that is characterised by features of both a mental health condition and a specific learning difficulty.

As noted in the fifth edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM-5), ADHD:

1. Is characterized by a persistent pattern of inattention and/or hyperactivity-impulsivity that interferes with normal functioning or development,
2. Is present in multiple settings (e.g., home, school, work),
3. Symptoms interfere with, or reduce the quality of social, academic or occupational functioning. Hyperactive-impulsive symptoms are less common in adults, who may present predominantly with problems of inattention. Educational performance is a specific difficulty for almost all individuals with ADHD,
4. Related to the attention deficits that characterise the disorder.

As it impacts on learning, ADHD should therefore be regarded as a specific learning difficulty. SASC recommends that practitioner psychologists and specialist teacher assessors who have relevant training2 can identify specific learning difficulties and patterns of behaviour that together would strongly suggest a student has ADHD; and in this situation they can make relevant recommendations for support at Further and or Higher Education institutions.

Such diagnostic assessments should be accepted by SFE in support of an application for Disabled Students' Allowance.

It is expected that a conclusion that ADHD is present should only be arrived at by an individual who has undertaken appropriate training and the necessary expertise. Reports should provide details of the basis for the diagnosis and recommendations for the level/type of educational support required. It is also a requirement that the report provides advice on how to seek medical advice and, if needed, access to psychological therapies.

9. Appendix 3: DSA Application Route Pre & Post AY2016/17

The application route for DSA involved multiple parties acting in a sequence. The researcher originated a visual representation of this sequence to help students understand it as it was undocumented by SFE in visual form in its entirety; it was published on his own NMH provider website between 2012-2019. Figure 33 shows the pre-Modernisation process, Figure 34 the post-Modernisation process from AY2016/17.

For pre-Modernisation applications, the steps depicted were broadly:
1. Student contacted own HEP's disabilities team for advice; applied for DSA. If students had been previously diagnosed (eg at school), and had a 'current', less than 2-year old, report, they could apply for DSA prior to arriving at their HEP,
2. Student met a Diagnostic Assessor and, if the tests so indicated, received a 'diagnosis' in a Diagnostic Assessment Report (DA) of an SpLD as evidence of need,
3. Student met a Study Needs Assessor who converted the technical diagnostic assessment report (NAR) into a statement of support deliverables, such as NMH specialist study skills support, assistive technology (AT) hardware and/or software, mental health mentor support,
4. With both Diagnostic Assessment (DA) and Needs Assessment Reports (NAR) to hand, Student Finance England (SFE) selected suppliers nominated in the NAR and issued the appropriate letter to the student, their HEP Disability Advisor, Assistive Technology (AT) and NMH providers.

From AY2016/17 with the enforcement of the two-quote system, see Appendix 4, S.10, the process changed, see Figure 34. The numbering refers to the red oval highlights.
1. SFE selected the NMH provider with the lowest hourly rate from the two referred in the Needs Assessor's report, and names that supplier in the 'DSA2' letter sent to the student. That named supplier may or may not be the students' HEP,
2. The onus is now the student to contact the named NMH provider,
3. The NMH provider is contacted by the student,
4. The NMH provider assigns a Study Skills Tutor

See also Appendix 4, S.10 regarding the two-quote system which is referred to in the post-Modernisation DSA application process , item 1.

Figure 33: DSA Application Route Prior to AY2016/17 as published on researcher's website 2012-2016
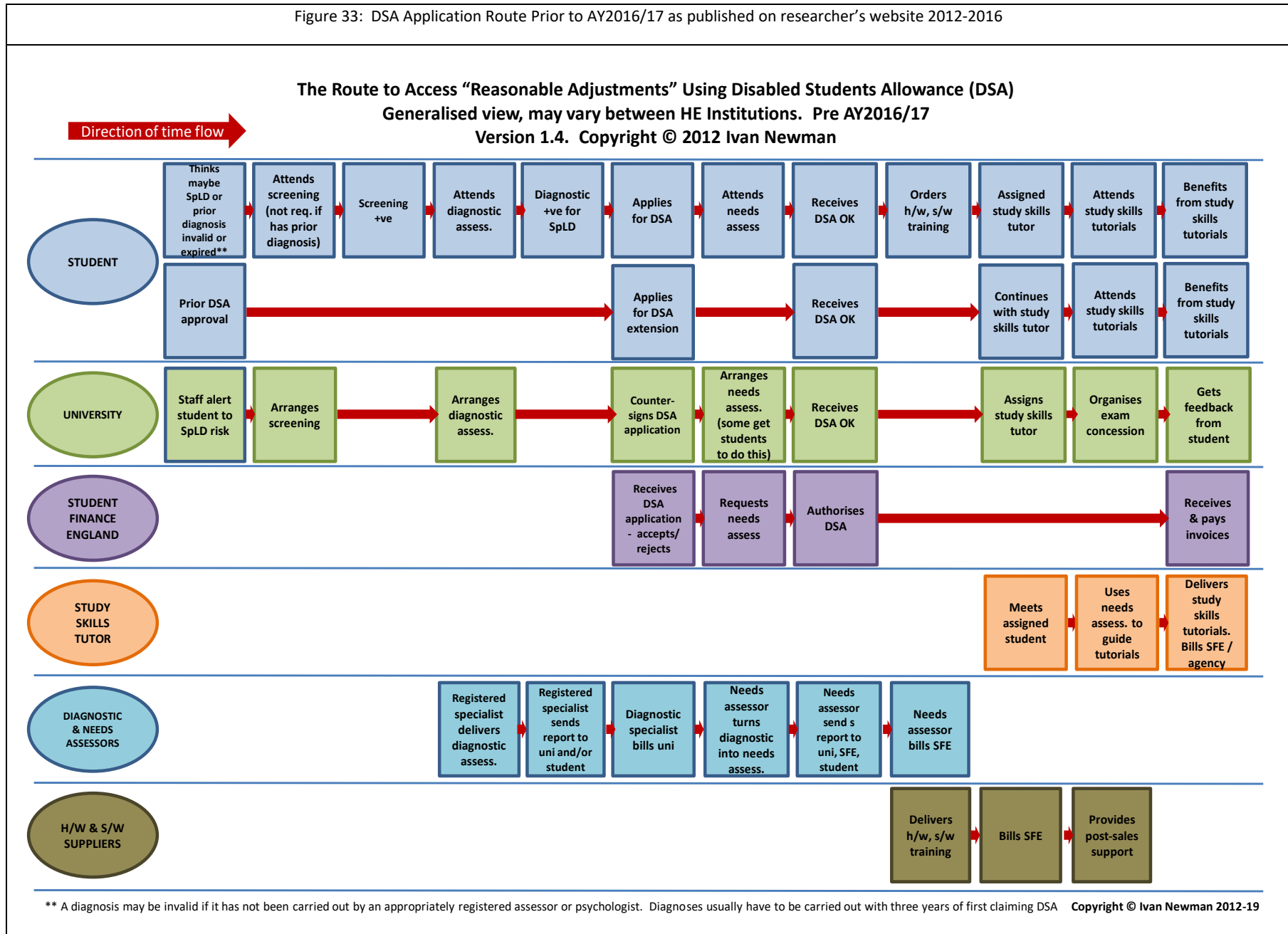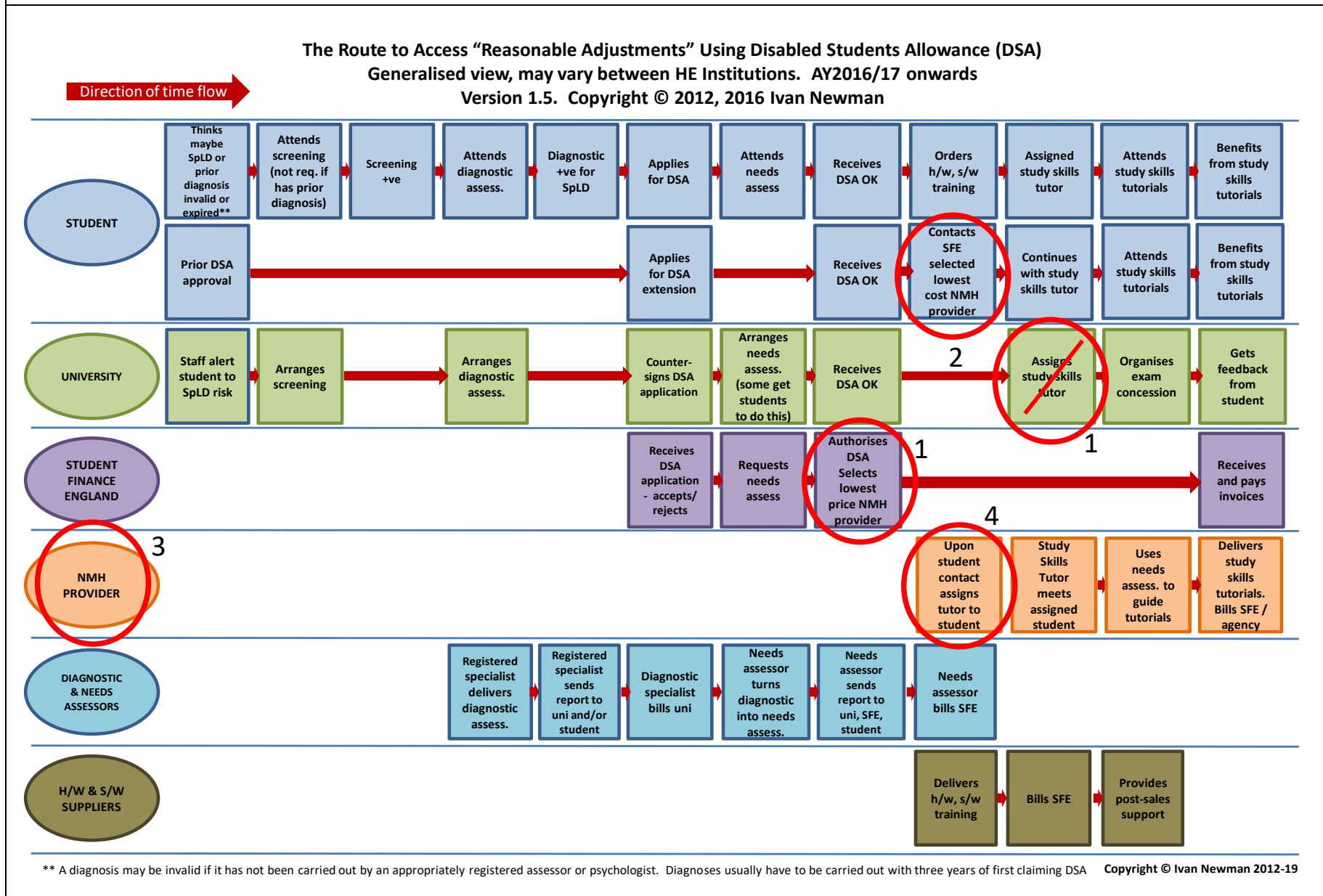
The Route to Access "Reasonable Adjustments" Using Disabled Students Allowance (DSA)
Generalised view, may vary between HE Institutions. Pre AY2016/17
Version 1.4. Copyright © 2012 Ivan Newman

Direction of time flow →

STUDENT

| Thinks maybe SpLD or prior diagnosis invalid or expired** | Attends screening (not req. if has prior diagnosis) | Screening +ve | Attends diagnostic assess. | Diagnostic +ve for SpLD | Applies for DSA | Attends needs assess | Receives DSA OK | Orders h/w, s/w training | Assigned study skills tutor | Attends study skills tutorials | Benefits from study skills tutorials |

| Prior DSA approval | | | | | Applies for DSA extension | | Receives DSA OK | | Continues with study skills tutor | Attends study skills tutorials | Benefits from study skills tutorials |

UNIVERSITY

| Staff alert student to SpLD risk | Arranges screening | | Arranges diagnostic assess. | | Counter-signs DSA application | Arranges needs assess. (some get students to do this) | Receives DSA OK | | Assigns study skills tutor | Organises exam concession | Gets feedback from student |

STUDENT FINANCE ENGLAND

| Receives DSA application - accepts/ rejects | Requests needs assess | Authorises DSA | | Receives & pays invoices |

STUDY SKILLS TUTOR

| Meets assigned student | Uses needs assess. to guide tutorials | Delivers study skills tutorials. Bills SFE / agency |

DIAGNOSTIC & NEEDS ASSESSORS

| Registered specialist delivers diagnostic assess. | Registered specialist sends report to uni and/or student | Diagnostic specialist bills uni | Needs assessor turns diagnostic into needs assess. | Needs assessor sends report to uni, SFE, student | Needs assessor bills SFE |

H/W & S/W SUPPLIERS

| Delivers h/w, s/w training | Bills SFE | Provides post-sales support |

** A diagnosis may be invalid if it has not been carried out by an appropriately registered assessor or psychologist. Diagnoses usually have to be carried out with three years of first claiming DSA   **Copyright © Ivan Newman 2012-19**

Figure 34: DSA Application Route from AY2016/17 onwards as published on researcher's website 2016-19

The Route to Access "Reasonable Adjustments" Using Disabled Students Allowance (DSA)
Generalised view, may vary between HE Institutions. AY2016/17 onwards
Version 1.5. Copyright © 2012, 2016 Ivan Newman

Direction of time flow →

STUDENT

| Thinks maybe SpLD or prior diagnosis invalid or expired** | Attends screening (not req. if has prior diagnosis) | Screening +ve | Attends diagnostic assess. | Diagnostic +ve for SpLD | Applies for DSA | Attends needs assess | Receives DSA OK | Orders h/w, s/w training | Assigned study skills tutor | Attends study skills tutorials | Benefits from study skills tutorials |

| Prior DSA approval | | | | | Applies for DSA extension | | Receives DSA OK | Contacts SFE selected lowest cost NMH provider | Continues with study skills tutor | Attends study skills tutorials | Benefits from study skills tutorials |

UNIVERSITY

| Staff alert student to SpLD risk | Arranges screening | | Arranges diagnostic assess. | | Counter-signs DSA application | Arranges needs assess. (some get students to do this) | Receives DSA OK | **2** | Assigns study skills tutor | Organises exam concession | Gets feedback from student |

STUDENT FINANCE ENGLAND

| | | | | | Receives DSA application - accepts/ rejects | Requests needs assess | Authorises DSA Selects lowest price NMH provider **1** | | **1** | | Receives and pays invoices |

NMH PROVIDER **3**

| | | | | | | | | **4** Upon student contact assigns tutor to student | Study Skills Tutor meets assigned student | Uses needs assess. to guide tutorials | Delivers study skills tutorials. Bills SFE / agency |

DIAGNOSTIC & NEEDS ASSESSORS

| | Registered specialist delivers diagnostic assess. | Registered specialist sends report to uni and/or student | Diagnostic specialist bills uni | Needs assessor turns diagnostic into needs assess. | Needs assessor sends report to uni, SFE, student | Needs assessor bills SFE |

H/W & S/W SUPPLIERS

| | | | Delivers h/w, s/w training | Bills SFE | Provides post-sales support |

** A diagnosis may be invalid if it has not been carried out by an appropriately registered assessor or psychologist. Diagnoses usually have to be carried out with three years of first claiming DSA   **Copyright © Ivan Newman 2012-19**

10.   Appendix 4: 3rd Party NMH Provision concern with 2-quote system

In 2015, SFE circulated a letter to NMH providers referring to the 'two-quote' system. The following describes the context of that letter and a process which was never fully documented by BIS, DfE or DSA-QAG. The description is drawn from the researcher's own professional experience, supported by sources shown in the text. Note that the enforced two-quote system is incorporated in the process described in the preceding Appendix 3, S.9, Figure 34 and associated description.

Prior to the Modernisation, in their Assessment reports Needs Assessors had included two potential suppliers for both Non-Medical Help and Assistive Technology provision (DSA-QAG, 2016f). Student Finance England, although it had been keen to introduce competition into the supply of these services, for the NMH element had allowed exemptions to HEPs, enabling NMH providers known to the HEP to be nominated as the sole supplier. The HEPs and these known NMH providers often had longstanding professional relationships. In many cases the HEP itself would deliver the NMH support to its own students and were referred by Needs Assessors in their reports to so do.

As part of the Modernisation, SFE moved to withdraw the exemptions and enforce the two-quote system by awarding NMH supply to the lowest quoted rate between the two providers referred by the Needs Assessor. The mechanism for enforcement comprised the Quality Assurance Framework (QAF) for Needs Assessors (DSA-QAG, 2017g) and the QAF for NMH Providers (DSA-QAG, 2016a).

In the new approach, Needs Assessors were expected to identify potential NMH providers by consulting a registration database created and operated by DSA-QAG. NMH providers were invited to register on the database and were able to nominate those HEPs at which they wished to supply support. Based on the NMH providers' nomination of interest in HEPs the database was supposed to function by generating two randomly chosen NMH provider names, together with their hourly support rate which Needs Assessors would then include in their reports. SFE would, during the process leading to award of DSA, select the lowest price provider. Any one NMH provider might have no connection with or knowledge of the HEPs it so nominated in the registration database, they would be external 3rd party suppliers. However, HEPs could, if they wished, decide to become registered NMH providers, but there was no guarantee that they would be awarded the NMH provision for their own students.

HEPs which registered as NMH providers, and when referred by Needs Assessors as a supplier for NMH provision, retained their ability to manage their DSA-funded NMH support delivery end-to-end, however, at the cost of bearing onerous new paperwork requirements which were seen to have no benefit, compliance with new QAF often at very short notice, and heavy audit requirements especially regarding the literalism of QAF interpretation by the auditors. Additionally, the new referral system removed any certainty regarding the numbers of students whom they would be referred, and hence removed any certainty as to their level of DSA-derived income, leading to downsizing and closure of disability support functions. Further, where HEPs, even though registered as NMH providers, were not the referred supplier they lost visibility over those students' support, often receiving no feedback from 3rd party

suppliers or were unable to handle multiple sources of feedback from different 3rd party suppliers (Anon, 2018).

Many HEPs chose not to register as NMH providers, foreseeing the negative implications of so doing and felt that, whilst they avoided the compliance, audit and income uncertainty issues of those which did, worried that their students found themselves 'trapped in the middle' of a complex and confusing system, fraught with potential for delays. These HEPs fully recognised that they had lost visibility over their students' support delivery, noting that feedback from the 3rd party suppliers was at best poor. Additionally, as the HEP was no longer responsible for its own students' support, the serious issue arose of who should provide the necessary and QAF-mandated quiet and confidential space in which support tutorials should occur, see above. HEPs also worried that they were not able to fully discharge their duty of care.

Some effects of the enforcement of the English two-quote system were described in the Welsh Government's report *A Review of the Disabled Students' Allowances*, it led to "a myriad of providers operating on [HEPs' campuses]" and identified the difficulty of providing "high quality [support] work [through the 3rd party provision model] (Starks & Woolger, 2017, pp. 62, 44).

An undated letter, believed circulated in September 2015, from SFE, responded to HEPs' concerns regarding the 2-quote system in which NAs nominate NMH providers (SFE, 2015):

sfe

student finance england
the student finance experts

Dear Colleague

Thank you for your letter regarding the current arrangements for the provision of non-medical help at your institution and your request that the Department for Business, Innovation and Skills extend your exemption to the two quote process for such support.

The Department has considered the points you have raised specifically and also a range of other points that have been raised by other institutions that may be of general relevance.

Institutions have raised the following broad points: assurance of quality supply, retention of trained staff, administrative complexity, loss of institutional choice and control, issues with site access, DBS checks, issues with access to internal systems, managing student complaints, investment in training, loss of integration between institution and supplier, effect on interim support, validation of qualifications, students with multiple needs and administrative burden for the student.

The Department has considered these points carefully and has concluded that none of them would provide sufficient cause for maintaining an exemption indefinitely, though some would support allowing a brief period during which institutions could introduce any administrative changes necessary before the two quote policy is fully in force.

A number of institutions raised specific concerns about their directly employed staff, who they consider may need to be redeployed or made redundant before the outcome of the consultation on non-medical help (NMH) ends. The Department recognises that, as a result of the ongoing consultation, Institutions face a degree of uncertainty over how non-medical help support might be provided in the future. This consultation closes on 24 September, following which the Department will need to analyse the responses before Ministers take a final decision. The Department has therefore decided to grant a temporary extension to an exemption from the two quote process where institutions consider it necessary on the grounds of retention of trained, directly employed staff, until the outcome of the consultation is known.

Your response indicates that your NMH provision is primarily provided by staff directly employed by your institution. The Department has therefore agreed to allow an extension of your exemption to the two quote process until the start of the application period for academic year 2016/17, by which time the outcome of the consultation is expected to be known. The Department has therefore granted an extension to your exemption until 31 January 2016. Thereafter all DSAs-funded support for new students will be subject to the two-quote process, unless an individual (i.e. student specific) exception is justified. Further information will be issued in due course setting out when such individual exceptions might be considered.

The NMH quality assurance process is being developed and will be in place for new applications for 2016/17. The Department plans to hold roundtable meetings about the quality assurance framework for NMH at the end of October. They will invite representatives from across the sector to attend.

If you have any questions about the content of this letter, please contact us at DSAquote_exemptions@slc.co.uk

Kind regards,

Anthony Hill

Targeted Support Services Manager
The Student Loans Company

11. Appendix 5: Full Results Tables (Madriaga, et al., 2010)

Full results tables, including SDs, from (Madriaga, et al., 2010).

<table>
<tr><td colspan="3">Significant differences in mean scores by area of difficulty by disability status.
Likert scale responses where 1 = strong agreement with statement, 5 =strong disagreement.
Simplified adaption from (Madriaga, et al., 2010, p. 652)</td></tr>
<tr><td>I have problems/difficulties with:</td><td>Disabled students</td><td>Non-disabled students</td></tr>
<tr><td>Taking notes</td><td>2.66 (SD=1.256)</td><td>3.65 (SD=0.921)</td></tr>
<tr><td>Hearing lecturer</td><td>3.51 (SD=1.031)</td><td>3.83 (SD=0.922)</td></tr>
<tr><td>Reading course materials</td><td>2.88 (SD=1.089)</td><td>3.25 (SD1.136)</td></tr>
<tr><td>Physical access to building</td><td>4.15 (SD=1.021)</td><td>4.34 (SD=0.799)</td></tr>
<tr><td>Handouts/other materials not being in an appropriate format</td><td>3.15 (SD=1.188)</td><td>3.90 (SD=1.25)</td></tr>
<tr><td>Writing continuously in exams</td><td>2.54 (SD=1.140)</td><td>3.03 (SD=1.096)</td></tr>
<tr><td>Giving oral presentations</td><td>2.87 (SD=1.181)</td><td>3.18 (SD=1.135)</td></tr>
<tr><td>Literacy skills (spelling, grammar etc)</td><td>2.48 (SD=1.393)</td><td>3.49 (SD=1.183)</td></tr>
</table>

<table>
<tr><td colspan="5">Means scores for disabled and non-disabled students for the following statements ranked by eta squared (from least to most) [Eta scores: the larger the score, the larger the difference between the scores. This tables shows most similar at head and least similar at foot] (Madriaga, et al., 2010, p. 655)</td></tr>
<tr><td></td><td></td><td>Questionnaire statement
(5=Disagree strongly; 1 =Agree strongly)</td><td>Disabled group sample</td><td>Non-disabled group sample</td></tr>
<tr><td></td><td>1</td><td>The feedback on my work helps to clarify things that I haven't fully understood</td><td>3.46 (SD=0.959)</td><td>2.47 (SD=0.970)</td></tr>
<tr><td></td><td>2</td><td>My lecturers make a real effort to understand difficulties I may be having with my work</td><td>3.32 (SD=0.985)</td><td>3.30 (SD=0.917)</td></tr>
<tr><td></td><td>3</td><td>I have had difficulties due to lectures, seminars, workshops interfering with mealtimes**</td><td>3.67 (SD=1.039)</td><td>3.69 (SD=.1.060)</td></tr>
<tr><td></td><td>4</td><td>My lecturers give me helpful feedback on my progress</td><td>3.35 (SD=0.959)</td><td>3.33 (SD=0.931)</td></tr>
<tr><td></td><td>5</td><td>The feedback on my work helps me improve my ways of learning and studying</td><td>3.66 (SD=0.848)</td><td>3.63(SD= 0.910)</td></tr>
<tr><td></td><td>6</td><td>My lecturers have been helpful when I have approached about difficulties in my studies</td><td>3.83 (SD-=0.892)</td><td>3.78 (SD=0.913)</td></tr>
<tr><td></td><td>7</td><td>I find some teaching staff uncooperative**</td><td>3.25 (SD=1.226)</td><td>3.18 (SD=1.168)</td></tr>
<tr><td></td><td>8</td><td>My lecturers make it clear right from the start what they expect of me</td><td>3.26 (SD=0.916)</td><td>3.31 (SD=0.926)</td></tr>
<tr><td></td><td>9</td><td>My lecturers normally give me useful comments on my work</td><td>3.42 (SD=0.995)</td><td>3.5 (SD=0.941)</td></tr>
<tr><td></td><td>10</td><td>My lecturers give me plenty of examples and illustrations to help with my understanding</td><td>3.42 (SD=0.924)</td><td>3.50 (SD=0.847)</td></tr>
<tr><td></td><td>11</td><td>My lecturers are good at explaining things in a number of different ways</td><td>3.44 (SD=0.921)</td><td>3.52 (SD=0.811)</td></tr>
<tr><td></td><td>12</td><td>The handouts and/or other materials on WebCT/Blackboard are helpful</td><td>3.98 (SD=0.982)</td><td>4.06 (SD=0.833)</td></tr>
<tr><td></td><td>13</td><td>I sometimes find it difficult to discover what is expected of me in coursework**</td><td>2.40 (SD=10.82)</td><td>2.49 (SD=0.988)</td></tr>
<tr><td></td><td>14</td><td>Within my course, I have some choice over what aspects of the subject I choose to concentrate on</td><td>3.39 (SD=1.056)</td><td>3.29 (SD1.191)</td></tr>
<tr><td></td><td>15</td><td>My course is helping me develop my ability to work as a team member</td><td>3.8 (SD=0.983)</td><td>3.90 (SD0.864)</td></tr>
<tr><td></td><td>16</td><td>I frequently find it difficult to participate in discussions**</td><td>3.51 (SD=1.070)</td><td>3.61 (SD=1.008)</td></tr>
<tr><td></td><td>17</td><td>I have experienced difficulties with coursework because it is not always clear what is required**</td><td>2.29 (SD=1.049)</td><td>2.4 (SD=1.029)</td></tr>
<tr><td></td><td>18</td><td>The workload is too heavy**</td><td>2.76 (SD=0.878)</td><td>2.86 (SD=1.029)</td></tr>
<tr><td></td><td>19</td><td>I have some difficulties with participating in assessed group work</td><td>3.13 (SD=1.095)</td><td>3.26 (SD=1.088)</td></tr>
<tr><td></td><td>20</td><td>I have experienced difficulties with the amount of time available to complete coursework**</td><td>2.42(SD=1.116)</td><td>2.57 (SD=1.125)</td></tr>
<tr><td></td><td>21</td><td>My course is helping me to develop the ability to plan my own work</td><td>3.69 (SD=0.894)</td><td>3.82 (SD=0.767)</td></tr>
<tr><td></td><td>22</td><td>It is easy to know the standard of work expected</td><td>3.29 (SD=0.991)</td><td>3.44 (SD=0.890)</td></tr>
<tr><td colspan="5">** Items reversed</td></tr>
</table>

12.   Appendix 6: Example FYE implementation programme

The impact of institutional, programmatic and personal interventions on an effective and sustainable first-year student experience (Wilson, 2009)

This appendix provides a deeper insight into on an Australian provider's implementation of a First year Experience programme.

This paper was the keynote address at 12th First Year in Higher Education Conference and draws on personal experience as First Year Experience (FYE) advisor at Griffith University, Brisbane. It described a systematic whole of-university approach (first of kind for FYE in Australia) and presented institutional evaluation data.

The content included:
1. Rationale for inclusion in the conference, which was not to advocate for FYE but to illustrate:
    a. The way a whole institution approach was adopted to achieve an outcome for the whole student body,
    b. How such an approach was explicitly led and managed through identified new roles (FYA, FYL),
    c. That collaboration was the route to success,
    d. How explicit interventions were used to address observed, and data-proven, problems,
    e. How student engagement played a part in both problem analysis and problem solutions.
2. Description of FYE and whole institution approach to it.
3. Challenges to FYE field of practice (p. 1):
    a. Heroic individualism: "practice has focused on efforts of enthusiasts in local contexts",
    b. Status: FYE enterprise note appropriately located in academic hierarchy/invested with appropriate status,
    c. Alignment of strategies: There is no one silver bullet, need alignment of various strategies to facilitate student success [in a sense alignment is the golden bullet, or at least golden glue],
    d. Need for rigour in evaluation,
    e. Need to move from "leaders in practice" but need to internalise as leaders in "state of mind".
4. FY advisors (FYAs) strategy informed by literature regarding advising and link to student engagement. Role's aim is to facilitate "successful transition of commencing students to university" (p. 2)
5. FYAs are selected based on their interest in first year students' issues and experiences (p. 2), understanding and personal qualities of approachability (later in paper).
6. Foundation for success: working strategically
    a. Effective leadership: Single person positioned as acknowledged leader of FYE, possessing the appropriate attitude but not "doing all the work",

b. Adopting system's orientation: This is crucial for ensuring shared ownership and contribution, a primary function is to convene the relevant stakeholders who will collectively deliver the improved FYE,

c. Adopting an agenda of facilitating capability focused on "developing strengths rather than the remediation of problems", of both staff and students,

d. These "foundational ideas" operationalised through 5 design principles:

    i. Convening partnership roles, particularly the First Year Leader whose role is to identify and engage relevant partners. Not "heroic individualism" but "whole-of-School [sic] approach [providing]…a 'joined-up, wrap-around' educational experience" (p. 4),

    ii. Developing coherent practice models, based on understanding of commencing students' tasks and the university's system's practices supporting successful transition. Uses 'senses of success' model: of culture, capability, purpose, resourcefulness, connectedness, see Figure 35. Uses also 'student lifecycle' model: aspiration raising, pre-entry, first term/semester, moving through the course, and employment,

    iii. Data-based planning using input data (demographics), process evaluation data eg evaluation of enabling processes), soft performance outcomes (eg student satisfaction), hard performance outcomes (eg student retention, academic achievement),

    iv. Employing a complementary suite of strategies (1st generation strategies 0- bolt on eg orientation days, centrally run skills sessions; 2nd generation activities eg modifications in teaching quality, course design, transition pedagogy [note 3rd generation [of maturity model] hadn't been developed as at date of paper 2009]

    v. Engaging in continuous monitoring and feedback.

Figure 35: Five senses of success (Lizzio, 2006, p. 3)

The 'Five Senses' of Successful Transition
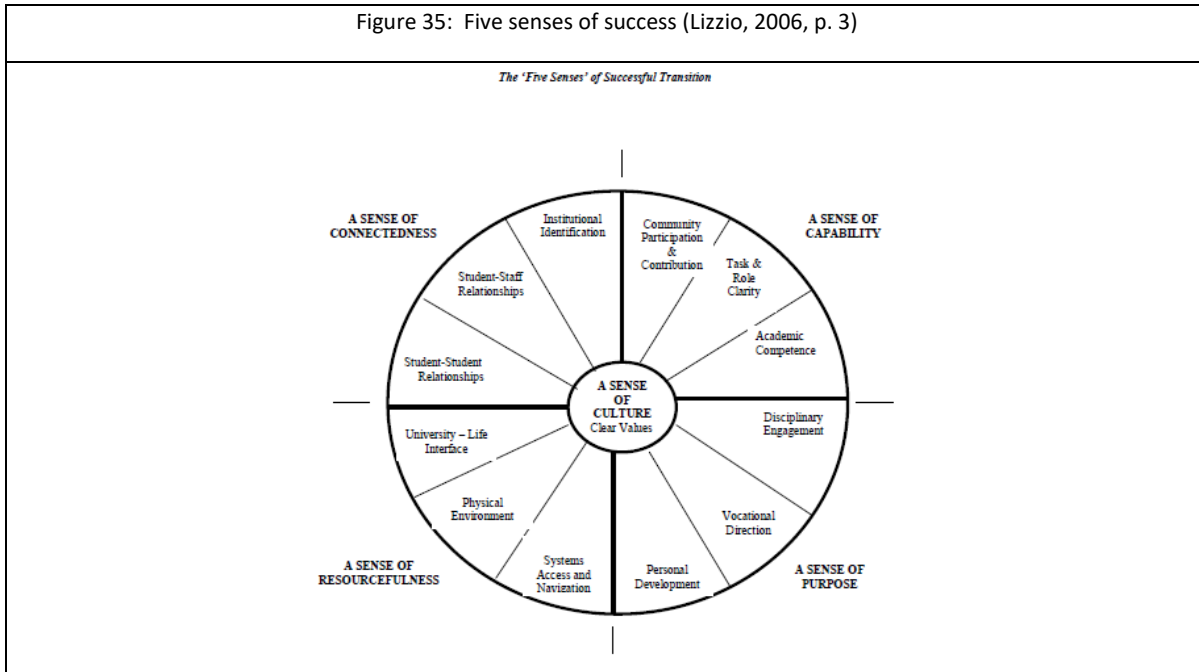
7. Curricular strategies:
    a. Enhancing course design: using 5-sense framework,
    b. Frontloading threshold courses/subjects: ensure that the courses which underpin the rest of the studies are done early and designed to ensure students have maximum chance of success in them,
    c. Enhance assessment practice:
        i. Ensure students understand what is expected of them,
        ii. Provide support in understanding and practising the subtasks required in the assessment,
        iii. Time the assessments appropriately,
        iv. Provide early formative safe environment opportunities to practise
        v. Rich feedback environment,
        vi. Debrief/reflect on experiences and stressors,
    d. Enhance teaching quality – common sense but crucial idea!
        i. Small class contexts,
        ii. Specially selected and assigned 1st year tutors,
        iii. Continuous debriefing, observation and feedback of teaching practice,
    e. Manage attendance/non-attendance: early intervention,
    f. First assessment intervention for at risk students.

13. Appendix 7: Eleven Principles of Inclusive Learning and Teaching (Hockings, 2010)

1. The need to see students as individuals, to learn about and value their differences and to maintain high expectations of all students.
2. The need for teachers to create safe learning environments in which students can express their ideas, beliefs, requirements and identities freely in an atmosphere of mutual trust and respect, empathy and open mindedness.
3. The need to establish at the outset clear rules of what is expected from students with tight control and close monitoring in order to develop confident learner identities and behaviours.
4. The need for teachers to create student-focused 'universal' programmes, modules and lessons that engage all students meaningfully by encouraging them to draw on and apply their own and others' knowledge.
5. The need for teachers to anticipate, recognise and provide for individuals' specific physical, cultural, academic and pastoral needs, particularly at critical periods (e.g. transitions, examinations).
6. The need for shifts in negative beliefs about, and attitudes towards, student diversity that currently inhibit the development of inclusive learning and teaching.
7. The need to challenge and change policies, practices, systems and standards that inhibit the participation of students in any subject or constrain teachers' capacity to engage all their students.
8. The need for greater involvement of students in the negotiation of the curriculum, assessment and in the development of teachers.
9. The need for adequate time, resources and a safe environment in which staff at all levels can develop a shared understanding and commitment to student diversity and inclusive practice. Such understanding and commitment should be a key component of staff recruitment, training, development and reward.
10. The need for adequate and relevant central services to support students and staff; integrating strategies for teaching and learning, widening participation and disability; and co-ordinating the efforts of academics and specialist support staff in central service centres.
11. The need for collection and analysis of institutional, quantitative and qualitative data for the evaluation and improvement of inclusive learning and teaching strategies, policies and practices.

# 14.	Appendix 8: The Studies' Questionnaires

Study 1: Understand the nature of an inclusive learning environment.

PART A – To be answered by all (preceded by a question requesting consent)

Question	Response
What is your name and email address?	Free text
What is your role (eg Specialist Study Skills Tutor, Disability Advisor, Head of Disability Services, Other, please specify)?	Free text
For Specialist Study Skills Tutors, Disability Advisors, other roles: For which HEPs do you deliver specialist tutorial support?	Free text
For Heads of Disability Services, other managerial roles: What is the name of your HEP?	Free text

PART B – Answered by Specialist Study Skills Tutors, Disability Advisors (and Heads of Disability Services if they wish to give a personal view)

Question	Response
In your personal opinion what is the nature of an inclusive learning environment? Your answer can include both the objectives of an ILE as well as how an HEP might achieve/implement those objectives.	Free text
What SpLD issues are likely to be addressed by your personal view of an inclusive learning environment? (For clarity, your answer can be categorised by individual SpLDs, eg dyslexia, dyspraxia)	Free text
What SpLD issues might remain unaddressed by your personal view of an inclusive learning environment? (For clarity, your answer can be categorised by individual SpLDs, eg dyslexia, dyspraxia)	Free text
What do you see as the main barriers to implementing an inclusive learning environment?	Free text

PART C – Answered by Heads of Disabilities Services only

Question	Response
What is your HE Institution's view of the nature of an inclusive learning environment? Your answer can include both the ILE objectives of your HEP as well as how your HEP plans to achieve those objectives (that is, implement them).	Free text
What SpLD issues are likely to be addressed by that institutional view of an inclusive learning environment? (For clarity, your answer can be categorised by individual SpLDs, eg dyslexia, dyspraxia)	Free text
What SpLD issues might remain unaddressed by that institutional view of an inclusive learning environment? (For clarity, your answer can be categorised by individual SpLDs, eg dyslexia, dyspraxia)	Free text
What do you see as the main barriers to implementing an inclusive learning environment at your HE Institution?	Free text

Study 2: Establish baseline of effects of early changes on NMH providers and investigate use of Remote Working Tools for NMH support delivery

Section 1 – Demographic Questions (preceded by a question requesting consent)

Question	Response
1. Your name?	Free text
2. Your email address?	Free text
3. What is your primary role(s)?	Free text
4. At which HEPs do those students to whom you offer support study?	Free text
5. What is your employment status at these HEP(s)? Tick all which apply. If other, please elaborate.	Employed Contractor working for the HEP Contractor working for an agency Freelance Other
6. May I contact you to seek further information or clarification?	Yes/No

Section 2 – Question About Your Support

This section asks about the support you give and changes you may have experienced as a result of the changes to the DSA itself or associated administration.

Question	Response
7. Comparing this academic year to last academic year how has the number of students referred to you changed?	Many more Slightly more No change Slightly fewer Many fewer
8a. To what do you attribute the change in numbers?	Free text
8. What modifications have you made to your support delivery this academic year compared to last year because of the changes to DSA or the way DSA is administered?	Free text
9a. Please explain the reason(s) behind the changes you made:	Free text
9. What effect do you think the DSA changes will have over the next academic year on your own support function/support business? Please give examples.	Free text

Section 3 - Dealing with SFE/DSA-QAG

This section asks for information about your dealings with SFE and the registration process for DSA-QAG.

Question	Response
10. To what extent have your dealings with SFE altered in this academic year compared to last year?	Free text
11a. Which of these alterations do you attribute to DSA changes?	Free text
11. Have you registered with the DSA-QAG database?	Free text

12a. If Yes, please describe your actual experience of the registration process:	Free text
12b. If No, please explain your rationale for not registering:	Free text
12. How difficult have you found requesting additional support hours via Needs Assessors?	Very easy Somewhat easy Neither easy nor difficult Somewhat difficult Very difficult Not experienced
Please describe.	Free text

Section 4 - Working with HEP(s), agencies (if applicable)

This section asks about your dealings with your HEP(s) and/or your Agency(ies).

Question	Response
13. What changes, if any, have you experienced this academic year compared to last in the way your HEPs deal with you?	Free text
14a. Which of these changes do you attribute to DSA changes?	Free text
14. If you work for an agency, what changes have you experienced this year in the way that agency deals with you? If you don't work for an agency, please say so then skip to next question.	Free text
15a. Which of these changes do you attribute to DSA changes?	Free text

Section 5 - Inclusive Learning Environment

This section asks about progress you HEP(s) may be making towards implementing an Inclusive Learning Environment.

Whilst there is no widely accepted definition of an ILE, for the purposes of this survey, an ILE is one where:

- Education is designed to simultaneously accommodate students with diverse learning needs, and that this instructional design is included from the outset.
- The design covers the accessibility of curriculum content and curriculum presentation, assessment method and assessment timing.
- The built environment facilitates physical access.

Question	Response
15. In this academic year compared to last what progress has there been in the delivery of an Inclusive Learning Environment at your HEP/the HEPs whose students you tutor?	Much more Some more No change A little less Much less I have no information either way
Please explain.	Free text
16. In the past year, to what extent has an ILE (assuming there is one) affected the need for support by students with SpLDs at your HEP/the HEPs whose students you tutor?	Significantly reduced the need for support Somewhat reduced the need for support Has had no effect on the need for support Somewhat increased the need for support Significantly increased the need for support I don't have enough information to say
Please explain.	Free text

Section 6 – Using Skype to Deliver Tutorials

The use of Skype and similar technologies for delivering remote tutorials could be seen as an example of good inclusive practice. There has been considerable discussion amongst practitioners about such delivery and the recent BIS Guideline that remote tutorials must be specifically requested in Needs Assessment reports. This section aims to identify a range of evidence about such usage based on practitioners' own experience.

Question	Response
17. Which of Skype, FaceTime or Google Hangouts do you use/have you used to deliver face-to-face tutorials? (Click all which apply)	Skype FaceTime Google Hangouts None of these Other

Question	Response
18a. If you answered None of these please give your reasons and then skip to the end of the survey	Free text
18b. If you selected Other, please specify:	Free text
18c. What influences which of Skype, FaceTime, Google Hangouts you use?	Free text
18. Typically, how often do you use Skype, FaceTime or Google Hangouts each week for delivering face-to-face tutorials?	More than 20 times Between 10-20 times Between 1-9 times
19a. Please describe, with examples, the top 3 positive aspects your students have found using Skype, FaceTime or Google Hangouts for their tutorials with you: [You can give more than 3]	Free text
19b. Please describe, with examples, the top 3 negative aspects your students have found of using Skype, FaceTime or Google Hangouts for their tutorials with you and how you have reduced/eliminated them: [You can give more than 3]	Free text
19c. Please give examples of when delivering physical tutorials in a room together with your students has not satisfied their needs.	Free text
19. The latest DSA-QAG guidelines state that Skype can only be used to deliver tutorials if it has been specifically recommended by a Needs Assessor (BIS, March 2016, p. 17). Please give what you consider to be the pros and cons of this guideline, ideally with illustrative examples.	Free text

Study 3: Identify HEPs' challenges implementing inclusive learning environments.

Here are the questions to guide our meeting:

1. Your consent will be requested.
2. What is your job title, time in role, reporting line, budget?
3. What are your short term (this academic year) objectives and your longer term ones?
4. How are inclusivity, inclusive teaching, inclusive education defined at your HEP?
5. What guidance do you give your staff about how they should aim to achieve inclusivity of particular groups?
6. What are the main 'things' you have achieved so far?
7. What have been your main frustrations/blockages to achievement?
8. What are the 3 strategies which have worked best for you?
9. What are the 3 strategies which have worked least well for you?
10. What is the level of support you have received from a) senior management, b) academics, c) support staff?
11. To what extent do you work with your HEP's disability support team?
12. To what extent are you working with other HEPs, or others, on inclusivity & inclusive education?
13. To what extent are you aware of any national project concerning inclusive education?
14. How is progress towards inclusivity being measured a) now, b) in the future.
15. If you could change 3 things about your role, what would they be?
16. What other questions should I have asked, but didn't, regarding Inclusive Learning Environments?

Study 4: Effect of changes on NMH providers after 1 year

Background Demographic Information (preceded by a question requesting consent)

Question	Response Options
1. In what part of the UK do you deliver NMH tutoring?	(All which apply): London, East of England, North-west England, North-east England, South-west England, South-east, East Midlands, West Midlands England, Wales, Scotland
1. How many HE students have you been supporting as an NMH practitioner over the past 3 academic years?	2014-2015: 1-10, 11-20, 21-30, 31+ 2015-2016: 1-10, 11-20, 21-30, 31+ 2016-2017: 1-10, 11-20, 21-30, 31+
2. At which HEPs/FECs do your students study?	Free text
3. What is your status as an NMH supplier?	(All which apply): I work on my own. I employ NMH suppliers. I bill SFE directly. I work for one or more agencies. I supply as a contractor to HEPs/FECs. I represent or work directly for an HEP/FEC
4. If you are registered as and NMH provider, how many new students have come to you since April 2016 where you have been named as NMH provider on the DSA2 letter, excluding change of provider requests?	1-5 6-10 11-15 16-20 20+
5. How does this compare to the number of new students you received in prior years?	Many more A few more The same A few less Many less
6. Please describe the effect of the new referral system on your NMH practice.	Free text

Communications around the DSA Modernisation & the QAF

Question	Response Options
1. To what extent do you agree or disagree with the following statement: "I feel that the DSA Modernisation, on the whole, is a good thing."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
2. How clearly do you feel **BIS/DfE** has **communicated** with you about the DSA Modernisation since it was announced in April 2014? Required	Very clearly Somewhat clearly Somewhat unclearly

Question	Response Options
	Very unclearly Not at all
3. To what extent do you agree or disagree with the following statement? "I feel enthusiastic about the DSA Modernisation."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
4. How do you think **DSA-QAG** has **communicated** about the QAF: Regarding its purpose? Regarding its contents? Regarding its implementation?	Range for each sub-question: Very clearly Somewhat clearly Somewhat unclearly Very unclearly Not at all
5. What other comments do you have about the **communications** regarding the DSA Modernisation and/or the QAF?	Free text

Quality Assurance Framework – the QAF

Question	Response
1. How well does the QAF demonstrate an understanding of the practice of NMH support?	Very well Quite well Quite poorly Very poorly
2. To what extent do you agree or disagree with the following statement? "I have found it easy to **write/create** the policies the QAF requires me/my business to have."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly N/A in my role
3. To what extent do you agree or disagree with the following statement? "I have found it easy to **find the training** the QAF requires me/my business to have." (eg Data Protection, Safeguarding).	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
4. To what extent do you agree or disagree with the following statement? "Overall I have found it easy to **comply** with what the QAF requires me/my business to have."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
5. What are your views about the audit fee you are being charged as part of complying with the QAF?	The fees are appropriate to my practice Fees have been waived as I've had no referrals The fees are inappropriate to my practice N/A as I'm employed by an HEP/FEC or agency
6. How has the QAF **affected your everyday practice** of NMH supply?	Free text

Question	Response
7. What **other comments** do you have about the QAF's requirements and/or its implementation?	Free text

Working with DSA-QAG and the QAF Audit

Question	Response
1. This academic year, 2016/17, how have you found **working with DSA-QAG on a 'day-to-day' basis**, eg responding to your queries, in terms of: i. Speed of response? ii. Ability to resolve issues completely: iii. Clarity? iv. Professionalism?	Range for each question: Very good Somewhat good Somewhat poor Very poor N/A: No direct contact with DSA-QAG.
2. To what extent do you agree or disagree with the following statement? "I feel that DSA-QAG treats me as a professional."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
3. What other comments do you have about DSA-QAG?	Free text

Question	Response
Have you been audited by DSA-QAG?	No, Go to Not Yet Audited. Yes, Go to Audited.
Not yet audited: 1. To what extent do you agree or disagree with the following statement? "I understand what is involved in a DSA-QAG audit."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
2. What do you feel about **consequences**, as you understand them, of failing the QAF audit? Required	Free text
3. Do you have any other comments about the DSA-QAG audit process?	Free text
Audited 4. To what extent do you agree or disagree with the following statement? "The DSAQAG 5. audit was/is being carried out professionally."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
6. Regarding the actual audit, to what extent do you agree with the following statement? "The audit **went much better** than I thought it would.	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
7. What was **outcome** of your audit?	Free text
8. Please describe **your experience** of the audit overall.	Free text

General questions about delivering NMH services

Question	Response
1. To what extent has this academic year been **easier or harder** for you in providing NMH services?	Much easier Somewhat easier Somewhat harder Much harder
2. How, if at all, has your relationship changed with the HEP/FECs where your students study?	Free text

Question	Response
3. To what extent do you agree with the following statement? "I feel **more empowered** as an NMH tutor as a result of the DSA Modernisation"	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
4. To what extent do you agree with the following statement: "I am **thinking of withdrawing** from supplying NMH services as from the coming academic year."	Agree strongly Agree somewhat Disagree somewhat Disagree strongly
5. What other comments do you have regarding the DSA Modernisation's effects on your business?	Free text

Impact on Students with Disabilities

Question	Response
1. What has been the impact on **your own tutees** of the DSA Modernisation (Please answer with examples to support your points)?	Free text
2. What other comments do you have regarding the DSA Modernisation's **overall effects on students with disabilities?**	Free text

Study 5: Effect of changes on HEP's disability support functions after 1 year.

Introductory letter from Chairman of NADP inviting participations from Heads of Disability Services

Message from Paddy Turner, Chair of NADP

We are hearing that the changes made to DSAs in a number of ways are having significant effects on the support we are able to provide to students with SpLDs.

If this is indeed the case, and we are to feedback these effects to government in the hope of having some impact, then we must do so based on reliable data.

As a result, we are asking for your support in generating this data by asking what is happening at your HE Institutions and FE Colleges. One of our members, Ivan Newman, is conducting doctoral research into aspects of these changes and already has some interesting early findings which he has discussed with us and with other professional organisations. As a result of these conversations, Ivan has kindly agreed to run another survey to enhance and target these findings in more depth. The aim will be to seek a meeting with the Dept. for Education and others later in the year to discuss what has emerged and what can be done to improve the situation.

Please be reassured, information you provide is safeguarded. It will be held securely and only be used anonymously; the survey is subject to the British Education Research Association (BERA) Guidelines (2014). Please send any questions about the survey to Ivan: ivan.newman@student.rau.ac.uk

Simple online completion: Completion is easy, either in one or multiple sessions. If using multiple sessions, check your 'Spam/Junk' folder for the email containing the resume link.

To help you frame your answers, the questions are available as a downloadable pdf.

Your input is vital, please take a few moments to relate your experiences.

The survey is now open - closing at midnight, Friday July 21st.

Best wishes, Paddy

This section asks for your consent and some basic demographic information

Question	Response
1. Do you consent to participate in this study and the data you provide being used anonymously, in accordance with the study information sheet presented on Page 1?	Yes, No
2. What type of HE organisation do you represent? If you selected Other, please specify.	Higher Education Institution (HEP) Further Education College (FEC) Other
3. What is the size of your HEP/FEC in terms of undergraduate student numbers?	0-5,000 5,001-10,000 10,001-20,000 20,001,30,000 30,001+
4. Which business model for NMH delivery have you adopted?	My HEP/FEC has registered as an NMH provider, and this in-house delivery can be in conjunction with 3rd party NMH provision. (Continues with Q 5) Our support is delivered ONLY by 3rd party NMH providers (Skips to Q 12)

You have registered as an NMH provider. This part of the survey asks about your in-house support as an NMH provider as it has operated this academic year at your HEP/FEC.
When referring to students, the survey is concerned with students with Specific Learning Difficulties, SpLDs. All references to the QAF relate to the DSA-QAG Quality Assurance Framework, V1.5, May 2017

Question	Response
1. Is the choice of in-house NMH provision to deliver support to your SpLD students a change from previous academic years? That is, you changed from 3rd party NMH provision to in-house provision this academic year. Please provide background information.	Yes, No Free text
2. To what extent do you agree with the following statement? "We are satisfied with the in-house provision of NMH support delivered this academic year to our SpLD students." Please explain, with a summary of any data you may have.	Agree strongly Agree somewhat Disagree somewhat Disagree strongly Free text
3. What feedback, positive or negative, have you received this academic year from your SpLD students regarding the in-house supply of their NMH support?	Please summarise any data you may have. If none received, please answer None.
4. To what extent is your service able to provide support for your SpLD students in space which is "comfortable,	Fully able to provide Provide for the majority

Question	Response
confidential" and "takes account of their disabilities needs" and is not in "public open space"? (QAF 2.4, 4.4).	Provide for the minority Do not provide Insufficient information to answer Please explain your answer, giving examples or data to illustrate how the space is or is not available.
5. What has been the effect of registering as an NMH provider on your service's workload? Please give examples, and if you have data, please summarise.	Free text
6. Have you been audited by DSA-QAG?	Yes, please answer the following 'audit experience' question No, please skip the following 'audit experience' question Please summarise your audit experience.
7. Are there further points you would like to make about the changes in the DSAs and their effects on your in-house NMH support provision for SpLD students?	Free text
8. Do 3rd party NMH providers deliver support for your SpLD students at your HEP/FEC?	Yes (Continues with Q 12) No/not to my knowledge (Skips to Q 20)

This part of the survey asks about the support delivered this academic year at your HEP/FEC by 3rd party NMH providers. This 3rd party NMH provision can be in conjunction with in-house provision. When referring to students, the survey is concerned with students with Specific Learning Difficulties, SpLDs. All references to the QAF relate to the DSA-QAG Quality Assurance Framework, V1.5, May 2017.

Question	Response
1. Is the choice of 3rd party NMH providers to deliver support to your SpLD students a change from previous academic years? That is, have you changed from an in-house or mixed provision to only 3rd party provision this academic year?	Yes, it is a change from previous academic years. No, it's the same provision as we used before.
2. To what extent do you agree with the statement "We are satisfied with the support 3rd party NMH providers deliver to our SpLD students"? Please explain, with a summary of any data you may have	Agree strongly Agree somewhat Disagree somewhat Disagree strongly Insufficient information to answer Free text
3. To what extent are you satisfied with the level of feedback about your SpLD students received from NMH providers? (QAF 2.9)	Very satisfied Somewhat satisfied Somewhat dissatisfied Very dissatisfied Insufficient information to answer

Question	Response
Please explain, giving examples to illustrate, with a summary of any data you may have.	Free text.
4. To what extent are your 3rd party NMH providers able to provide support for your SpLD students in space which is "comfortable, confidential" and "takes account of their disabilities needs" and is not in "public open space"? (QAF 2.4, 4.4) Please explain your answer, giving examples or data to illustrate how the space is or is not available.	Fully able to provide Provide for the majority Provide for the minority Do not provide Insufficient information to answer Free text
5. Please describe the steps have you taken with your 3rd party NMH suppliers regarding "working on-site familiarisation" eg they are aware of your organisation's codes of practice, are identified/identifiable on campus etc (QAF 2.7). If none, please reply None.	Free text
6. What feedback, positive or negative, have you received this academic year from your SpLD students regarding the 3rd party supply of their NMH support? Please illustrate with a summary of any data you may have. If none received, please answer None.	Free text
7. Are there further points you would like to make about the changes in the DSAs and their effects on 3rd party NMH support provision for SpLD students?	Free text
8. To what extent do you agree with the following statement? "We can deliver integrated support to SpLD students more effectively under the new NMH support provider model (post April 2016) compared to the previous NMH support provider model (pre April 2016)." Please add any explanation, with examples and/or data.	Agree strongly Agree somewhat Disagree somewhat Disagree strongly Free text

This final section asks about a complementary aspect of the DSAs Modernisation, the requirement for HEPs/FECs to implement more inclusive teaching and learning environments.

Question	Response
1. Does your HEP/FEC have an organisation-wide project to implement an inclusive teaching and learning environment?	Yes No Don't know
2. If "Yes", what is your/your service's role in the project? If "No", please summarise what initiatives there are but which are not organisation wide.	Free text

Study 6: DSA-QAG Roadshow Feedback questions (preceded by a question requesting consent)

Question	Response
1. My organisation is:	a. An NMH Provider solely
	b. An HE institution/FE College registered as an NMH Provider
	c. An NMH Provider plus another function (please give further information below)
Please give further details if you answered c.	Free text
2. Approximately how many NMH support workers are there in your organisation who support students receiving DSAs?	1-5, 6-19, More than 20
3. Which Roadshow did you attend?	London (October 17th, morning) London, (October 17th, afternoon) Birmingham, (October 18th, morning) (October 17th, afternoon)
4. How satisfied were you with the content of the presentation about DSA-QAG (Karen Docherty)?	Very satisfied, Somewhat satisfied, Somewhat dissatisfied, Very dissatisfied
Please explain your answer.	Free text
How satisfied were you with the content of the presentation about Disabled Students' Allowances (Greg Boone)?	Very satisfied, Somewhat satisfied, Somewhat dissatisfied, Very dissatisfied
Please explain your answer.	Free text
5. How satisfied were you with the content of the presentations about the NMH Registration/ Audit Process Overview and Audit Outcomes (Jim Kersse, both presentations)?	Very satisfied, Somewhat satisfied, Somewhat dissatisfied Very dissatisfied
Please explain your answer	Free text

Question	Response
6. How satisfied were you with the contents of the presentation on the Audit Process Stages (Stuart Allen)?	Very satisfied, Somewhat satisfied, Somewhat dissatisfied, Very dissatisfied
Please explain your answer.	Free text
7. Thinking of the Q&A session, how satisfied were you with the answers the panellists gave to the audience's questions?	Very satisfied, Somewhat satisfied, Somewhat dissatisfied, Very dissatisfied
Please explain your answer.	Free text

Question	Response
8. Thinking of the presentation section of the meeting, was it:	Too long? About right? Too short?
Please explain your answer.	Free text
9. Thinking of the balance of time between the four speakers, was this:	Good? Fair? Poor? I have no view
Please explain your answer.	Free text
10. Thinking of the management of the question and answer section, were you?	Very satisfied, Satisfied, Dissatisfied, Very dissatisfied
Please explain your answer.	Free text
11. Overall, how satisfied were you with the Roadshow?	Extremely satisfied Very satisfied Moderately satisfied Slightly satisfied Not satisfied
12. What did you find most useful?	Free text
13. What did you find least useful	Free text
14. What would you like to have been covered but wasn't?	Free text
15. What would you have liked covered in more detail?	Free text
16. Are there any other comments you'd like to make about the Roadshow?	Free text

15. Appendix 9: Study Information Sheet and Informed Consent

Studies 1-6 were accompanied by a study information sheet and informed consent request. The first question in the online questionnaires requested consent in accordance with the SIS, without which the respondents could not continue with the questionnaire. An example is given below:

Study Information Sheet example

This survey examines the effects of changes in DSA on your specialist one-to-one support and aims to inform the whole HE sector. This doctoral research is supervised by Dr John Conway of the Royal Agricultural University, john.conway@rau.ac.uk.

The questionnaire should take only 15 minutes.

Closing date is midnight July 25th, 2016.

Survey Structure

The survey is structured in six short sections:

1. Demographics information
2. Your support delivery
3. Dealing with SFE/DSA-QAG
4. Working with your HEP(s) or agency
5. Inclusive Learning Environments
6. Use of Skype to deliver tutorials

Summary of changes to DSA

For reference, these changes can be summarised as:

1. Shifting the burden and a proportion of the costs of making anticipatory reasonable adjustments, as required under the Equality Act (2010), onto HEPs.
2. Reducing or removing certain allowances (NMH) and placing the responsibility for the provision of the services they funded onto HEPs.
3. Introducing or tightening rules and procedures for various parties involved in the provision of disabilities' support to HE students, and
4. HEPs implementing Inclusive Learning Environments (ILEs) as a way of enabling them to assume their anticipatory responsibilities.

Thank you for participating.

Informed Consent request

By completing this questionnaire, I give my consent that my anonymised input will be used in academic research and may be published in academic literature, including a doctoral thesis, as well as more widely, for example in submissions to government.

I understand that:

- I can withdraw from the research at any time, without question, by giving notice to Ivan Newman at ivan.newman@student.rau.ac.uk
- Any input I give will be anonymised before publication.
- All information I give will be held confidential and stored in passworded systems.
- The research is subject to the British Educational Research Association (BERA) Guidelines, 2011.
- My consent is given by checking the box below and continuing with the survey.

16.   Appendix 10: Narrative responses on restriction using RWTs

This appendix presents respondents' narrative comments from sub-study 2 regarding benefits and drawbacks in using RWTs and incorporates a selection of students' views as supplied by respondents. The section is organised by category. This narrative illustrates the variety of circumstance which needs to be accommodated in order to make these students' support "…accessible to all…" as suggested in Hocking's definition of inclusive teaching and learning (Hockings, 2010).

Benefits of using RWTs

Health Conditions

Physical Health Conditions
Respondents made a total of 7 comments about short- and long-term physical illnesses causing unexpected absences from campus, potentially placing already vulnerable students at further disadvantage and risk of falling further behind. One respondent also talked about RWTs giving the "…ability to work with a student who is not feeling well enough to attend [an on-campus session] and [which avoids the potential for] passing on an infection to me." During convalescence, students could also feel well enough to attend an RWT delivered tutorial but not sufficiently robust to attend physically.

One respondent provided a graphic example of a sudden-onset physical health condition, "…[my] student…had a severe rash which had come up suddenly and who did not want to be seen by anyone" but her tutorial was successfully delivered by RWT.

Mental Health Conditions
Mental health conditions and their impact on students' ability to attend on-campus tutorials were mentioned in 8 comments. One stated that an RWT meant "Ease! Learners can Skype from home which has been very helpful for those with mental health conditions" and another "…particularly useful when there are health issues." Two respondents gave example of students suffering from anxiety and panic attacks, "…[it is useful] for a student who has ill health/bouts of depression … and doesn't know if she's able to leave her house … due to her mental health condition/panic attacks." These can be unpredictable and rapid conditions:

> "My student developed panic attacks in her 2nd year. They were completely unpredictable, sometimes she could attend in person and at other times not; the attack could develop at any point between home/uni and the tutorial. The solution was to use Skype whenever she couldn't attend. Otherwise she'd have had to cancel and then her DSA could have been taken away."

For one student, her usually well managed chronic depression turned severe, "…3 months before her exams developing into an agoraphobia and she couldn't leave her study/bedroom. We continued tutorials by Skype. The student successfully passed [all her exams over 2 years]."

Study Skills Support during Placements & Vacations

Respondents commented 28 times that many HE courses are structured with placements which require students to be absent from their campuses for considerable lengths of time. In addition to placements being in distant locations they can involve shift-working or working unsocial hours. One respondent wrote, "…[the] Skype option gives greater accessibility of support [for] NHS students who can't access support otherwise due to location, shift patterns…". Another reported that "…it [is] very difficult for [student nurses] to find the time on intensive placements to come into university for a session. They are simply not around." One respondent's student felt that "[w]ithout the Skype sessions I would have failed my nursing course. I could not attend the sessions on campus, or I was so tired after working then having to travel to University…I could not benefit fully."

Students could spend the full academic year abroad on exchange schemes. For one respondent her "[s]tudent was in Australia, so clearly Skype was the only way his support could be delivered …" One respondent noted "I've had people in Venice, Kenya, London and Durham … so the positive aspect is that we can talk at all."

Another respondent's student reported that "…as a PhD fine art student living [abroad], but studying in [the UK], the Skype sessions have been my only option for tuition." Respondents noted that post-graduate students were generally required to work during vacations and in general were less often present on campus during term time, "[they] often have very limited time to attend tutorials on infrequent visits to university", observing that RWTs were the only solution to providing continuity of support.

For undergraduate students, respondents noted that the nature of their students' learning difficulties often meant they could only keep up with their courses by doing academic work during vacations which might require delivering study skills support during vacations. One respondent talked about the fact that the need for vacation support could not always be planned [and therefore discussed with a Needs Assessor to allow an RWT to be recommended], "…the students couldn't predict that they'd need support during the vacations, so Skype was the only possible way of providing continuity of support."

Change in Personal Circumstances

Students' studies were just one part of their overall lives, as such they were subject to life's usual vagaries, as 12 comments illustrated.

One respondent's student was emphatic about the benefit of using Skype, it was "[l]ife changing. I could not get onto campus … I am on a part time course, am working and have two children. Before I started the Skype sessions I was thinking of giving up the course." Another SpLD student, was quoted, "I am a mature student and lecturer, but also have children and am working", with Danish as a first language and living there for much of the academic year the "…Skype sessions were undoubtedly beneficial" for his PhD studies.

One respondent's "…Army spouse was posted abroad for 3 years, [so] on campus tutorials were no longer an option", an RWT proved effective to deliver support thereafter. Mature students were also subject to "…unexpected work or family problems" which meant they could not always attend on-campus tutorials, "[my student had]…unpredictable childcare issues, she wouldn't know until an hour before the tutorial if she could attend." The respondent and student agreed that "…if she had to remain at home, [they] would Skype." Further "…if [we] hadn't [Skyped]… there would have been cancellations with consequences for DSA carrying on."

One respondent described the student who "…had to return unexpectedly to care for [her] sick mother. This was in the run-up to her 4th year exams. Tutorial support continued by Skype. The student [came back] for the exams, which she successfully passed."

In another example, a fast solution was required, "…an ASD student…at dissertation time - went into meltdown, but would communicate through FaceTime. We wouldn't have had time to go back and get it on to his Needs Assessment". For another student the problems related to marital breakdown, "…[this] student - third year - we'd never used Skype or FaceTime - separated from his wife and all of a sudden his attendance was completely erratic - no money for petrol; car breaking down; children needing child care. We could not have coped without Facetime." The respondent further commented that "I don't believe a Needs Assessor can or should be expected to, decide that a student will never need online support."

Individual Students' Comfort

Respondents were very much aware of the importance of their students' comfort, 27 comments addressed this point. There were numerous physical arrangements required to hold a physical tutorial on-campus, these did not always go to plan. One respondent remarked, about RWTs "…there's less to go wrong, such as [meeting] rooms double booked, queues to get into the library, transport and parking issues." One respondent referred to the need for students to be comfortable in their tutorial surroundings and reported that an RWT could help deliver this, "…being able to sit at home with all of their equipment, resources…around them…whatever they need is there…not having to travel at all…with heavy laptop…and books." Respondents mentioned that some students with ASD and mental health conditions could feel uncomfortable with having to meet in different and unfamiliar rooms, for them RWT tutorials were beneficial.

For a number of respondents RWTs were "…useful for students who are already learning in a virtual learning environment," whilst for others being at home participating in a tutorial via an RWT can mean they could use their specially adapted furniture.

However, some students experienced trepidation before using an RWT "I was scared at first of trying the Skype sessions but it is the best decision I ever made." That student, a "…single mum, doing placements in hospitals and studying", found the pressure "…very demanding" and believed that Skype was "…far better than face to face sessions sessions on campus because I am more relaxed at home, the timings are so very flexible and I have all my books and journals at hand."

Each student's quoted circumstance was unique, for one, "I am a single working mum, I am dyslexic, have ADHD and English is my second language" and felt "…more relaxed in my own home when I am having tuition." That student also stated, "I wish I had been offered these Skype sessions much earlier in the course."

Several respondents noted that they needed to offer a quick response to both new students seeking study skills support or to reschedule existing students. Whilst finding mutually convenient times for physical tutorials could present problems, respondents noted that these are lessened when RWTs were used – many more time slots became available.

Financial Constraints

Even when all else appears to be organised for an on-campus tutorial, matters might not be straightforward, "…students … have found they could not afford to travel to the tutorial at the last minute." Three respondents mentioned this issue and how using RWTs could avoid it.

Time Availability, Travel & Employment

This issue was the most commented upon, with 41 responses.

Depending on their students' courses, respondents commented that academic timetables could be densely packed, presenting significant difficulties in finding available times to attend on-campus tutorials on campus. For students with SpLDs, who "…already have significant time pressure" because their disability can reduce their organisational abilities which require them to work longer hours to keep up, RWTs could offered extended access to support.

Numerous respondents described RWTs ensuring "…no wasted time travelling" and being a "…fantastic contingency when bad weather threatens my [or my students'] travel," in which case "…the session doesn't need to be missed."

Respondents noted that students were often in employment and so had limited time on campus in general and specifically at a mutually convenient time with their NMH support worker. Additionally, for vocational courses, shift-work patterns could also mean attendance on campus was problematical.

Respondents aimed to schedule tutorials at convenient times for their students, "…learners can choose a time which suits them. I have found a lot of my learners like 8pm". However, such times might have been impossible for the tutor, campus premises might be closed and such times have associated safeguarding issues (DSA-QAG, 2016a). Respondents noted that using RWT helped avoid these issues.

Lifestyle and other technology usage

Respondents identified this category in 9 comments. Respondents also mentioned, *inter alia,* that SFE through DSA both promotes and supports the use of technology to help students become "independent learners" (ADSHE, 2009, p. 12) and that in the then current economic climate of austerity the use of 'freeware' [such as RWTs] was highly encouraged. Additionally, respondents mentioned that their

students lived their social lives in the technological world of electronic communication tools and were increasingly comfortable with them. Hence, respondents observed that placing the use of RWT technology behind an excluding barrier made little sense.

Drawbacks to Using a Remote Working Tool (RWT)

Generic Issues

Technology

When using both audio and video, respondents reported some problems with image or sound quality, eg, pixilation[46] or jumping in the former and distortion, lags or gaps in the latter, "Skype sometimes has less good quality pictures and sound" and it "…can be distracting for a learner when there is a delay in the sound/image." Respondents ascribed these problems to the quality of the participants' Internet/broadband connection, WiFi network and/or time of day. Respondents mentioned that connections could be lost, requiring redial or reversion to using mobile telephone. Whilst 16 respondents mentioned these issues, none suggested that they always happened, one reported they were "rare", nor that their occurrence made the long-term use of the RWT unworkable. A number reported that they pre-agreed back-up plans with their students in case of problems.

Some RWTs, eg Skype, Google Hangouts, also included the ability to send files between parties, swap textual information (including website addresses), no problems were reported with these functions.

The Study Skills Support Function

Respondents stressed the importance of creating rapport with students, in order to build confidence and motivation, according to their professional association's guidelines (ADSHE, 2009, p. 10), and how creating rapport in a 'virtual' environment was both different and potentially more difficult than meeting students in person. Respondents also mentioned the need for study skills tutors to use multi-sensory methods to deliver effective support, in accordance with professional guidelines (ADSHE, 2009, p. 2) and the challenge in doing so when using an RWT. One noted, "Skype restricts my ability to…use specific visual and kinaesthetic channels within a physical environment to reframe and express their thoughts." Using an RWT was seen by some as making more difficult certain fundamental aspects of delivering study skills support, eg, reviewing student-originated documents, annotating those and other materials printed during tutorials plus demonstrating study skills techniques, building ideas element by element or completing diaries/planners. One respondent commented, "[i]t is more difficult to scaffold them, to show them a new way of working." However, respondents also reported that they had developed effective alternative processes to handle these aspects of support, "…you can share screens so they can see me doing something, then I can see them". Nevertheless, as this respondent continued, "…this does lack the flexibility of working face-to-face. Also, when you do this you can't see how hard they are trying or their expressions as easily. They may say they understand but they may not really."

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[46] Pixilation: When the picture breaks up/distorts into visible rectangular/square blocks.

Student Specific Issues

Technology

To access the RWT, students used a variety of computers, varying in age, speed and reliability, resulting in variable results when using an RWT. Where the RWT used both video and audio, less powerful computers could give problems. Unreliability was also mentioned as a potential limiting factor in using an RWT, eg "[w]hen things go wrong with the Skype technology [it] can be due to an older computer or poor microphone…". Some students were reported as wary, at least initially, of the technology; reasons given were unfamiliarity with the RWT, previous poor experiences or difficulty in general with technology.

The Study Skills Support Function

Some respondents felt that students could respond less well in an RWT environment, eg those with ASD or other communications difficulties, however, at least one respondent thought that her ASD students preferred RWT tutorial to one in person. Reading a student's body language, gauging a student's reaction and communicating with a reticent student were mentioned as issues when using RWTs. Some mentioned that their students could also be distracted if they were using their RWT in their home environment and that an RWT did not deliver "…holistic communication and personal contact." One respondent mentioned problems using RWTs for students with visual stress and other issues which could affect comprehension when using computer screens.

Strategies in response to drawbacks in using RWTs

To ameliorate generic technology issues, see above, respondents suggested turning video off temporarily, redialling the connection, using a network cable connection rather than WiFi, having an agreed backup of a mobile phone or landline and finally, *in extremis*, rescheduling at a different time or location(s). For problems associated with computers' microphones or speakers, respondents suggested their students purchase freestanding alternatives.

Some respondents handled the issue of the greater difficulty of developing a relationship using RWTs by initially meeting their students in-person, others offered students 30 minute 'taster' session to both help develop the relationship without the pressure of 'the clock ticking' on their DSA award and to overcome students' wariness of using an RWT. Additionally, respondents used these taster sessions to demonstrate aspects of the technology, eg sending files, so helping hesitant students gain confidence. Some respondents mentioned the practical issue of obtaining a signed timesheet for the tutorials which was solved by posting documents or a combination of email and scanning.

A small number of respondents suggested some students with communications difficulties might fare even less well when using an RWT eg ASD students. Additionally, the environment at the student's 'end' of the RWT was not controllable by the tutor and could be distracting for the student, eg if they were in an open library environment. Solutions offered again included meeting students initially on campus to establish rapport and offering 'taster sessions' to test the approach.

17. Appendix 11: Verbatim comments on DSA-QAG Audit Roadshows

This Appendix presents verbatim comments provided in response to the survey's narrative questions.

How satisfied were you with the content of the presentation about DSA-QAG (Given by Karen Docherty, DSA-QAG Chief Executive Officer)?

Verbatim narrative comments

1. The DSA-QAG presenters wanted the 1:1 provider to be lenient with their inefficiencies but expected a prompt response to their auditing requirements. Also, they seemed to be tailored to deal with queries from big organisations rather than from small individual providers,
2. Useful to have DfE, DSA-QAQ and SFE present but some passing of the buck between the 3 organisations. Some major issues raised which are very concerning,
3. The Roadshow was prescriptive regarding audit. No further clarification was given to answer questions submitted by attendees. Attendees raised many concerns regarding support, framework and systems which were disregarded,
4. The presenters were not factual they presented spin, not how it is. Usual take given that all providers are in the wrong and SLC and QAG are using funds wisely and communicating properly, neither which is not the case,
5. I felt she wanted to present that she knew the information and the field, but when tested demonstrated lack of knowledge,
6. Whilst I understand that the speaker wanted to position DSA-QAG as independent of the DFE/SFE, it really didn't wash! DSA-QAG are acting on those organisations' behalf. They are certainly not acting on behalf of we the practitioners, although we are paying! The speaker's later stress on the small size of the organisation also seemed like an excuse for missing its deadlines. I resented the speaker's later implication that we the practitioners caused the delays when we were late in our responses. Some of the DSA-QAG timelines for practitioner response are unreasonable,
7. I do not think it is clear what the status of DSA-QAG is. Karen said that people often think they are part of SFE and that they are not. But what are they? Who set them up? They are a registered charity - should they be communicating the messages from Government bodies?
8. Having been signed up to the DSA-QAG for 18 months it would have been very worrying if we were not aware of what it was and why it existed,
9. A lot of explanation was given to the process and the organisation which as NMH providers we were already aware of, a recap can be useful but seemed a little unnecessary,
10. Brief with little or no new content,
11. The information was largely what we already knew and left little time for telling them what the difficulties are,
12. Speaker emphasised the independence of DSA-QAG but didn't explain how they had been made 'responsible for' various aspects of NMH provision, who paid them, or what make them eligible for Charitable status. I requested clarification on the last point some time ago but didn't receive an

answer. If DSA-QAG is independent of SFE why does it only have responsibility for DSA students funded by SFE and not all DSA students, e.g. those receiving DSA funding from NHS Bursaries?

13. She helped put the road show & DSA-QAG in context with SFE,
14. Just told us what we already knew about the audit.

How satisfied were you with the content of the presentation about Disabled Students' Allowances (Given by Greg Boone, Department for Education, DSAs policy team leader)?

Verbatim narrative comments

1. All he did was reiterate what we mostly knew. There was no real rationale given behind many of the changes, they seem as arbitrary as ever,
2. I understand that the government is going towards efficiency in the use of funding and I am in favour of an inclusive approach adopted by HEPs,
3. Didn't need to be told very basic information on the DSA process, wasn't pitched correctly for the audience,
4. Not sure he fully understood the issues around the DSA,
5. It is just that he doesn't know what is actually going on in practice and this came across,
6. Once again, the DSA team leader knows little about DSA. Much like his predecessor, he frequently offers to take away for response / feedback issues raised to the team -but has little understanding about what we as practitioners are asking for,
7. The presentation was clear but there was nothing new,
8. Again, having been signed up to the DSA-QAG for 18 months it would have been very worrying if we were not aware of DSA funding cuts and inclusive practice. I was given the same information at a Westminster briefing nearly 2 years ago,
9. As NMH providers he was presenting information we were all well aware of - I personally have been involved in providing support to students in receipt of DSA for 10 years, seemed a pointless exercise, as NMH providers we already know and understand DSA
10. Interesting information about take up rates and future plans,
11. A presentation that had previously been made available across the sector and lacking detail of substance,
12. As above. They didn't really appear to want to hear what we had to say because by the time that they go to Birmingham they already knew that there were a lot of issues being raised,
13. 9 PowerPoint slides, 6 with excessive amounts of text. 10 acronyms. The HE 'Triangle Model' of Universities' responsibilities is clearly a 4-sided figure (not of [the speaker's] manufacture). There seemed to be a time issue. Not ideal for an audience containing at least 2 severely visually impaired NMHs and 2 hearing-impaired. The Signer had to work flat out to convey the spoken explanation, leaving no opportunity for the NMH to read the slide at the same time. 'Death by PowerPoint' (Don McMillan) came to mind,
14. Didn't think it was needed - time could have been spent on Q&As.

How satisfied were you with the content of the presentations about the NMH Registration/Audit Process Overview and Audit Outcomes (Both given by Jim Kersse, DSA-QAG Operations Manager)?

Verbatim narrative comments

1. It was rather vague and generic,
2. More useful if you hadn't been through the audit process than if you had,
3. Delivered as you would expect as an auditor but real concern over issues of interpretation of the guidelines – VARIABLE [original emphasis],
4. Waste of time - not factual and poor at answering questions,
5. Cut short. Best practice guidelines were more reading data off a sheet and less functional advice. Asides of course from do as we say not as we do, because we are such a small team - type chatter,
6. This information would have been really useful BEFORE [author emphasis] the processes went live. To deliver this info well over a year afterwards seemed back to front,
7. Jim does not have full and clear knowledge of NMH and the practices related to delivering a service,
8. It seems clear that there are no audit outcomes or clear structures for the audit. Everyone audited so far has passed and yet there are no indicators of what was good and was bad,
9. Again, having already been through the process they were not informing me personally of anything I didn't already know,
10. I felt some of the statistics quoted were quantifiable but that hadn't been taken into consideration for example the rate of ineligible tutors included qualified tutors who could not find misplaced certificates in time for the audit,
11. Historical information that was barely relevant and audit information that was available elsewhere, certainly if your organisation had been audited,
12. He was basically saying that we only do what we are told,
13. 4 clear PP slides. Explanations delivered at a good pace. Failed to mention the registration process which preceded the current one. I've been involved in both registrations,
14. Didn't think it was needed - time could have been spent on Q&As.
15. Very useful to have the contextual overview,
16. Knew 90% of the content already.

How satisfied were you with the contents of the presentation on the Audit Process Stages (Given by Stuart Allen, DSA-QAG Compliance Officer - Internal)?

Verbatim narrative comments

1. Auditing seems to a tick the box process with no consideration for what is actually being audited or 'measured',
2. More useful if you hadn't been through the audit process than if you had. bringing in information at the end about certain forms no longer being needed from January with no further detail was not helpful,
3. Dull, unknowledgeable,

4. It is clear that Stuart does not know enough of the sector. Having the responsibility of delivering part of the presentation must have been difficult for him,

5. I thought that a guide to how to what type of documents and what format documents need to be in to be uploaded would have been more useful,

6. Again, no focus on specific changes additions just the process as I knew and had experienced it,

7. Clear description of the process,

8. Alarming that the audit around quality is process/spreadsheet driven with no indication that the audit searched for quality and best practice,

9. We already knew most of what we were told.

10. 4 clear PP slides. Audit process stages set out in uncompromising detail. Somewhat peevish comment on one slide, in italics and bold type, which said: 'Initial teething problems encountered with providers [not?] adhering to timescales which impacted NMH Team and created delays.' (Roadshow presentation p.22),

11. Didn't think it was needed - time could have been spent on Q&As,

12. Very useful and reassuring to have the story so far and the lessons learnt to date from the previous audits,

13. Couldn't hear speaker very well & couldn't see all of slides either (for all presentations). Knew most of info already.

Thinking of the Q&A session, how satisfied were you with the answers the panellists gave to the audience's questions?

Verbatim narrative comments

1. Not enough time to discuss issues which are at times so disparate,

2. Will be satisfied if answers to the questions posed are answered in the Q7A document promised,

3. Was appalled that Graham Tranter did not know the Data Protection waiver to which the students assent when submitting their DSA applications. The speakers just kept pointing their fingers at each other, basically saying "not my responsibility, it's theirs." From the practitioners' standpoint the parties stand together. Arguably DfE is ultimately responsible, but Greg Boone did not stand up to say, "the buck stops here".   It was useful to hear that there is a whistle blower 'line' - but rather surprised when so many questions seemed to have the answer "tell us via the whistle blower line",

4. Useful to have DfE, DSA-QAQ and SFE present but some passing of the buck between the 3 organisations. Some major issues raised which are very concerning,

5. Some information presented they clearly knew nothing about.   They tried to finish an hour early. They got basic information wrong,

6. There was not enough time for questions. Graham Tranter's answers were particularly weak,

7. Incorrect information was given, and panellists seemed to shift blame among each other,

8. Some answers highlighted the panel's lack of information particular re: DSA consent and the application forms. Some answers were evasive,

9. On the whole the panel responded to what was being asked with the exception of the representative from SFE,

10. It became obvious that there were too many people who did not know what was happening. SLC said, as they have done at every meeting where I have heard him speak, we don't know, or that's news to me,

11. The DfE representative did not stay for the session. The SFE representative was reticent and was only persuaded to answer a question when one delegate pointed out quite forcefully that he was the person who needed to respond,

12. Lots of Q's - not enough A's. I feel there are still some areas that we need definitive answers on, particularly around: - Change in provider process   - Who should/should not receive DSA2's   - How roles are listed on DSA2's (specifically in rems of the introduction of AS specific roles) to ensure compliance with the QAF,

13. So sad to witness people still waiting for answers 2 years on, quite shocking,

14. I felt that Graham Tranter from the SLC appeared to lack knowledge of key forthcoming changes (i.e. the new timesheet) and appeared ill informed of current SLC communications,

15. I didn't feel they answered fully.

Thinking of the presentation section of the meeting, was it too long, about right or too short?

Verbatim narrative comments

1. Proper breaks should have been built into the schedule and the atmosphere should have been less tense - there was a feeling of 'them' the DSA-QAG and 'us' the providers,

2. Room was inappropriate in a Cafe Rouge, cramped uncomfortable seating with piped music still playing. No tables available. Made it too long to sit and listen and take notes,

3. Very small room but felt that we hyper focussed on some issues,

4. The time allocated to present was about right. However, the content did not clarify positive solutions to difficulties experienced by Universities/NMH Providers,

5. People were there to talk about the QAF and audit. The DfE presentation was not necessary. Some of Jim's presentation was not required. Karen's was a promotion of DSA-QAG,

6. Whizzed through the presentation in less than half of the allocated time! When we wanted to ask questions, we had to wait until the end - even though the questions were relevant to the presentation sections being discussed,

7. too much information that was already part of our own knowledge base no additions or updates as such,

8. It fulfilled what it set out to do,

9. Not enough time for questions,

10. 5 presentations adequate, but a break should have been timetabled. When one was requested from the floor, and taken, the mingling of delegates and DSA-QAG team members helped to break down the 'them' and 'us' barriers,

11. More time for questions/answers would have been better however this would need to be chaired as some issues were covered in perhaps a little too much detail. Perhaps share the slides beforehand

and then attendees can send questions in advance to allow time for discussion and answers to be clear,

12. Most attendees were in Disability Advisor roles and had already been audited. The presentations ignored this fact & told us the bits we knew already.

Thinking of the balance of time between the four speakers, was this good, fair, poor or do you hold no view?

Verbatim narrative comments

1. All as short as each other,
2. Presentations were of little value equally,
3. It would have been good to hear the SFE representative talk,
4. There was a lot of information. Changes of speaker helped to keep us more alert and would also have helped the visually impaired delegates
5. Apart from Karen's I felt they were a waste of time.

Thinking of the management of the question and answer section, how satisfied were you?

Verbatim narrative comments

1. There were clearly more questions that they (the panel) could allow time to answer them,
2. In my opinion, the panel did not have positive solutions to clarify information. Communication between DSA, DfE and SFE are not consistent, contradicting each other's procedures, preventing a seamless framework. It was also apparent that the current model is not working for Universities or NMH Providers due to attendees' disappointment that was clearly displayed throughout the entire meeting. Furthermore, identifying that students' individual needs for much needed support is not a priority under this framework; although, it was advised that this would be changing in the future,
3. I found the whole thing pretty poor and lack comprehension,
4. The Q and A should have been longer. We had 45 minutes only, there was not enough time,
5. I thought that Karen Docherty's attempt to muzzle the meeting by a) telling us it was only 2 hours long not three and b) by calling a tea break (which lasted a whole 30 minutes) showed a real fear of facing us and being exposed to our anger,
6. Nowhere near enough time to answer all of the queries that we had,
7. In our session the panel tried to end the session at 3.30pm citing trains to catch (well so had we!) and were only willing to continue when it was pointed out that their own agenda stated a 4.30 close. we lost one member of the panel who presumably went to catch his train,
8. It was unfortunate that one attendee dominated the floor and some questions were asked more than once. One particular question made it clear how big the gap between the auditor's understanding of the process is compared to the audience's (I never found out what % my compliance was),
9. This required tighter control on the length any one topic of discussion was given. And where DSA process was being challenged the panel should have invited suggestions for improvement,

10. It was too short,

11. The agenda gave the meeting time as 13.30 - 16.30. But soon after 15.30 the CEO, having taken a few questions, tried to close the meeting. Delegates had to interrupt and point out the advertised closing time. It became clear that the fast pace of the presentations had been engendered by pressure to finish by 15.30. It was at this point that delegates requested a short break and continuation of Q & As until the advertised finishing time. It also became clear, from the animation of the delegates, that they had many burning questions and that this opportunity had been a strong motivator for attendance. I suggest that hearing from the NMHs was an informative experience for the team. They had seemed quite nervous throughout (inexperienced?). The delegates, now much enlivened, remained polite, but extremely positive,

12. As above - could have been handled better however it was difficult for the panel as there was a lot of hostility in the room which did not always make for a productive discussion,

13. Not enough time to ask questions. No time for detailed discussion & response.

What did you find most useful?

1. Understanding the overall timescales for responses. Hearing that there is a whistle blower line,

2. It was good to meet the people behind the generic DSA QAG team emails,

3. Q& A session (4 mentions, one "nit enough time to fully answer questions),

4. Another person attending commented on their insistence on EVIDENCE!

5. The Question and Answers section. Attendees benefited from this section which facilitators tried to reduce by an hour,

6. Not helpful as all about spin to make QAQ look good. Not convinced. they gave too many flannel answers. Fed up with SLC always answering with will need to refer to a colleague / DfE or another organisation,

7. Nothing,

8. Listening to other people's questions and the discussion relating to the questions,

9. Meeting other NMH providers and having the chance to discuss our policies and practices,

10. It made it clear what was being looked for and that they are willing to help us get through the experience. It made them more approachable. I feel it reduced the feeling of them trying to catch us out and focused more on trying to develop a process to evaluate the service offered. It was also quite clear how the three organisations represented don't communicate with each other. It was useful to hear how they understood that small organisations have less resources than the big organisations,

11. An opportunity to hear other's views on various aspects of DSA support, their audit experiences, and to feel that there is a consensus on some points,

12. Having the opportunity to point out that there is a problem with agencies being appointed by Needs Assessors and then not being able to support the student, and that Freelance tutors are not being allocated students as was proven by their figures of the number of accredited providers who have not been allocated students and therefore are not being audited,

13. Finding out a little more about the people running DSA-QAG and hearing pertinent questions and comments from the delegates,

14. Updates on upcoming changes,
15. Insight into the recurring themes from the audits carried out to date - this will help us in preparation for our forthcoming audit.

What did you find least useful?

1. Greg Boone's recap of DSAs,
2. DfE talk (too basic),
3. Repeat of where we had come from,
4. Presentations,
5. SLC and QAG always blame rest of sector,
6. I knew as much about the audit when I went in as I did when I left. This whole event was not worth the time out of work,
7. Presentations by the panel,
8. I thought it all had value,
9. Repetition of old information,
10. Being told things that we already knew,
11. The lack of expertise in delivering presentations was detrimental to the overall experience. I found myself drifting into a slide induced coma quite early on,
12. Lack of answers to ongoing issues that were raised,
13. All speeches apart from Karen's,
14. Some of the historical context of the DSA-QAG process - I am well read on that,
15. Presentation about DSA!

What would you like to have been covered but wasn't?

1. How DSA-QAG can become more realistic about the paperwork demands. Why some of the apparently arbitrary decisions about qualifications were taken,
2. More information on what providers need to do to comply with auditing in terms of the paperwork that they need to submit with examples of policies required,
3. We were told examples of best practice would be available, but they weren't, just stats to do with and examples of non-compliance,
4. Would like to have got down to the actual issues around the audit and interpretation,
5. Flexibility to constructively resolve attendees' difficulties and explore positive solutions that work for the people that are providing support, in the best interest of the students they are supporting,
6. Why they have 2 quotes for NMH, then again when supplier one fails to supply. What they do when 2 suppliers charge the same. Why they ignore requests for a specific provider made by either assessment centre or student when based on solid given reasons,
7. An example audit - best practice examples, top tips, FAQs from people who have been audited,
8. Reasons for change from a social model of disability to a medical model of disability with introduction of mandatory qualifications for specialist mentors who are required to be counsellors,

doctors, nurses and therapists whilst the support provided is academic skills focused and not therapeutic,

9. More information about what will be focused on in the next stage of the audit next year,

10. How the future of quality assurance might look when genuine aspects of quality are explored. The interesting dynamic between the quality and audit group and the audited NMH providers who pay for the same group and that group's employees,

11. I'm not sure that I would have been satisfied whatever they'd said, to be honest; it is clear that the process is not fit for purpose for the students and for NMH providers and it needs to be radically altered, if not completely removed as it is a waste of money,

12. How DGA-QAG's work will benefit the students. Surely this is fundamental. And how DSA-QAG will work with NMHs to achieve this common goal,

13. Answers to ongoing issues around the points I have raised. These have been an issue since the start of 16/17 so should have been ironed out by now,

14. Detail about what the auditors were looking for specifically to cover the more problematic areas - eg area 4.6 of the audit checklist. Time to discuss with other providers.

What would you have liked covered in more detail?

1. How the tick box exercise of much of the audit demonstrates quality,

2. Examples of best practice documentation and records,

3. How they are ensuring support takes place in a proper confidential space - too many are still in open libraries and cafe's,

4. The audit process - will they visit, or won't they? How many staff do they expect to meet with?

5. What information they will be requesting next year,

6. The real lessons learnt from the audits to date. What DfE feel might be the impact of 26% plus of support workers stopping support 'with immediate effect',

7. The raison d'être for setting up yet another administrative tier to check on detail that could and should be covered by SFE (paperwork) and DfE (educational practice),

8. Cancellation issues related to SFE etc. Issues with students not receiving equipment for ages to £200 contribution and other related issues,

9. Problematic areas for HEPs when it came to evidence for the audit.

Are there any other comments you'd like to make about the Roadshow?

1. Greg Boone should not have left early, missing the Q&A. As the principle actor in this play, the lack of his voice meant I left very dissatisfied,

2. When I phoned to book my attendance at the Roadshow, they told me that this was open only to those who had been audited. I think this event should have been opened to all providers,

3. Don't think they should charge for these types of events and similar ones they have run in the past,

4. The venue was not appropriate. It was very noisy (the bar and restaurant were beside the meeting room). There was no ventilation, so we had to have a break outside the room, which meant less time

for questions. The stairs to the building were very steep and the lift was hard to find. It seemed that accessibility was not considered,

5. They had thought about what we wanted to know and set out to inform. They were willing (except SFE) to discuss issues and give their reasoning for decisions. There seemed to be a feeling willingness to learn and co-operate (to an extent). I thought it was valuable,

6. I really would have expected a more professional and polished approach to the event. NMH representatives gave up time and travelled distances to attend - it would be hoped that there would have been a more positive and collaborative approach to the session,

7. It was obvious that there are too many stakeholders and that NMH providers are being told one thing by one organisation and something different by another,

8. A positive comment first. A very important and appreciated opportunity for the DSA-QAG team and NMHs to find out more about each other. Amazed to discover how small the team is, given the disruption and extra paperwork it has created - a bit of a Wizard of Oz denouement moment for me. Just 4 of the team of 8 'manage' 600 NMHs! I am still not convinced that DSA-QAG has the extensive knowledge of special education that their role demands - although they have shown themselves to be willing to learn. Whether it is in the delivery of non-medical help, or in the paperwork that goes with it, one-size does not fit all. The team need workplace experience so that they understand that NMHs are practitioners first and foremost. Paperwork is important, but subsidiary. A final point - the Roadshows were timed for weekdays during academic term-times. Very many NMHs are self-employed. As one of the delegates said, a day's cancelled sessions meant that the students lost their support, she lost a day's pay and also incurred travelling costs. But, demonstrably, a roomful of people had decided it was valuable to them,

9. Found it informative in terms of the audit however the audit is the end product of a process which is still unclear in places,

10. Refreshments were wonderful, thank you. Outside noises of music & talking interfered with trying to hear people in our room speak,

11. The venue in Birmingham (Café Rouge) was a poor choice of venue because of the cramped room and lots of background noise,

12. Terrible location in middle of city around morning rush hour. Terrible room - couldn't hear speakers well & no microphone used. Too hot & stuffy in room. Chairs so close together, I felt claustrophobic Certainly didn't feel an accessible location.

18.   Appendix 12: The Five Freedom of Information Requests (FOIRs)

FOIR1 – Utilisation of HEFCE Disability Premium

Freedom of Information Request to HEP: Name	
Applicant name	Ivan Newman
Applicant	

Nature of the request	This request concerns the way in which your HEP utilised certain funding received from the Higher Education Funding Council for England (HEFCE).
	In academic years 2016/17[1] and 2017/18[2], your HEP received £315,298 and £369,733, respectively. In 2016/17 this funding was known as "Improving Provision for disabled students" and in 2017/18 "Disability Premium".
	The FOI request is to know:
	   a) The monetary allocation of these funds to specific projects or initiatives, and
	   b) The aims, timescales, metrics and outcomes of each of these projects or initiatives.
	Hence, I am requesting information for which the following serves as an example:
	Funding allocated: Project A received £5,000.
	Aim: To develop an app to support students with autism.
	Timescale: Within the academic year.
	Metrics:
	   a) An app tested by 10 students.
	   b) App in use by 25 students.
	   c) Focus group feedback received.
	   d) Achieved by August 31st, 2017.
	Outcome: All metrics achieved by due date.
	If no specific projects or initiatives were supported by these HEFCE funds, please supply a text description of how they were used, following, as far as possible, the approach shown in the above example.

Format of response	Either an MS Word document or Excel spreadsheet emailed to the above address.
Prior requests	This information has not previously been requested by me.
Information availability	I do not believe this information is available in other documents published by your HEP under the Freedom of Information publication scheme.
References for funding details	2016/17[1]: http://www.hefce.ac.uk/funding/annallocns/1617/1617hei/ 2017/18[2]: http://www.hefce.ac.uk/funding/annallocns/1718/1718hei/ You may need to "enable editing" to view the data in the spreadsheets. The relevant data is shown in Table B.

FOIR2 – Inclusive Teaching

This Freedom of Information request concerns inclusive teaching at «HEP name», especially as regards disabled students with Specific Learning Difficulties (SpLDs).

It is likely that this FOI request would be best answered by your Head of Teaching and Learning, or equivalent.

Please accept my thanks to you and your colleagues for supplying this information.

Kind regards – Ivan Newman.

Freedom of Information Request to HEP: Name	
Applicant name	Ivan Newman
Applicant	
Nature of request	The way inclusive teaching is implemented at HEP name.
Format of response	The request has two parts and it would be helpful if you replied using the tables below, which can be copy/pasted into Word.
Prior requests	This information has not previously been requested by me.
Information availability	I do not believe this information is available in other documents published by your HEP under the Freedom of Information publication scheme.

A. Your HEP's academic staff's knowledge of inclusive teaching:
1. How does your HEP define inclusive teaching?
2. Does your HEP offer training in inclusive teaching to its academic staff?

2. If YES:
    a. How is that training delivered? (eg PGCHE/ PG CAP, CPD)
    b. How much training in inclusive teaching is offered? (eg hours per course/year)
    c. What % of your HEP's total academic staff has currently received this training?
    d. What % of your HEP's total academic staff receives this training annually?
    e. How do you track this training for each academic?
    f. Does the training explicitly include teaching students with SpLDs? And if so, what are the learning objectives of the relevant modules?

3. If NO:
    a. In what ways do you expect your academic staff to gain knowledge of inclusive teaching in general and for students with SpLDs in particular?
    b. How do you track each academic's acquisition of such knowledge?
    c. Does your HEP plan to offer training in inclusive teaching, if so, over what timescale?

B. Your HEP's incorporation of inclusive teaching in its under and postgraduate courses:

1. Does your HEP's validation/revalidation of new/existing courses take into account the ways in which they deliver inclusive teaching?

2. If YES:
   a. What percentage of your HEP's courses have so far been so validated/revalidated?
   b. By what date does your HEP expect to have all its courses so validated/revalidated?
   c. What are the key validation/revalidation criteria relating to inclusive teaching in general and for students with SpLDs in particular?

3. If NO:
   a. By what means does/will your HEP implement inclusive teaching in general and for students with SpLDs in particular?
   b. How does/will your HEP measure the implementation of such inclusive teaching?
   c. What are/will be the key criteria of such measurement?
   d. By when does/will your HEP expect all its courses to implement inclusive teaching?

FOIRs3 & 4 –Request for provider level detail on Widening Access, Improving Retention and Improving Provision for Disabled Students Monitoring Return AY2016-17 and AY2017/18

FOIR3, text below, was first sent to OFFA and HEFCE in February 2018 in respect of AY2016/17 and although framed as an enquiry was taken as a Freedom of Information Request. It was answered by OfS as OFFA and HEFCE became part of OfS in March 2018. In March 2019 email contact with OfS was re-established and the request repeated for AY2017/18.

Dear Sirs

I am engaged in doctoral studies regarding disabled students.

In my research some HEPs have identified that they send OFFA an annual return in which there is data entitled "Student success expenditure for support for disabled students". Within that category, they report:

1. Expansion of disability services (additional staff, training and resources)
2. Expansion of assistive technologies
3. Improvement of inclusivity of teaching and learning
4. Creation or extension of learning support posts
5. Other

My query is to ask if this information is reported anywhere on the OFFA website, and if so, where, as I would very much like to access and analyse it.

If the information is not currently available, please would you advise whether it would be available via an FOI request, which I would be happy to submit.

FOIR5 – Request for information on disabled students first applying for DSA after they enter HE

Dear FOI team,

I am engaged in doctoral research regarding disabled students and Disabled Student Allowances (DSAs) as they relate to students with Specific Learning Difficulties.

I note that figures are published on the number of students self-declaring SpLDs and those with SpLDs in receipt of DSAs.

As far as I can tell, the above figures relate to those students who both arrive at HE already possessing a diagnosis of an SpLD (the diagnosis having been done during their primary or secondary schooling) and those who are diagnosed for the first time whilst undertaking their HE course.
Please advise if this assumption is incorrect.

I would like to know this latter figure, the number each year of those diagnosed with an SpLD for the first time during their HE course for academic years 2014/15 onwards, but particularly 2016/7 and 2017/18.

I have reviewed your disclosure page but it seems that this information has not been previously disclosed. I also cannot see how the information required can be inferred from other published figures.

Prior to my submitting an FOI request (FOIR), are you able to tell me whether or not this data is held and, given the Freedom of Information Act (2000) time/cost exemption, whether it is better to submit an FOIR for each year or submit a single one?

It may be that you would prefer this request for information to be submitted as an actual FOIR, if so please advise accordingly.

I look forward to your email response shortly.

Thank you and kind regards - Ivan Newman

19.   Appendix 13: Kent Inclusive Practices and Framework for Driving ITL

One HEP [Kent University] responded to FOIR2 by describing and providing a hyperlink to its Kent Inclusive Practices (KIPs) initiative and the way in which it identified Key Performance Indicators (KPIs) the achievement of which might benefit its NSS rating regarding inclusive practices (Kent University, 2017) and drive the implementation of ITL. The KPIs related to Kent's objective of "giving preference to electronic ('born digital') resources". Table 95 shows each KPI and the number of the NSS question which might be affected by the KPI's achievement.

Table 95: Kent University Key Performance Indicators and potential influence on responses to NSS questions	
Key Performance Indicator	**Potential effect on NSS numbered questions**
Make module outlines accessible electronically (e.g. via Moodle) at least 4 weeks before the module starts.	• NSS 1. Staff are good at explaining things. • NSS 12. I have been able to contact staff when I needed to. • NSS 13. I have received sufficient advice and guidance in relation to my course. • NSS 14. Good advice was available when I needed to make study choices on my course. • NSS 19. The library resources (e.g. books, online services and learning spaces) have supported my learning well. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Make lecture/seminar slides accessible electronically (e.g. via Moodle) at least 24 hours before the session to enable all students to prepare (particularly students with notetaking difficulties).	• NSS 5. My course has provided me with opportunities to explore ideas or concepts in depth. • NSS 6. My course has provided me with opportunities to bring information and ideas together from different topics. • NSS 17. Any changes in the course or teaching have been communicated effectively. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Make prioritised reading lists available at least 4 weeks in advance to accommodate the provision of alternative formats and support those with slow reading speed.	• NSS 19. The library resources (e.g. books, online services and learning spaces) have supported my learning well. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Use lecture capture to assist notetaking, ideally for everyone, but at least for students with relevant Inclusive Learning Plans (ILPs).	• NSS 18. The IT resources and facilities provided have supported my learning well. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Make documents easy to navigate and understand.	• NSS 13. I have received sufficient advice and guidance in relation to my course. • NSS 15. The course is well organised and running smoothly. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Make presentations meaningful	• NSS 13. I have received sufficient advice and guidance in relation to my course. • NSS 15. The course is well organised and running smoothly. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Provide alternative media but make it accessible.	• NSS 13. I have received sufficient advice and guidance in relation to my course. • NSS 15. The course is well organised and running smoothly. • NSS 18. The IT resources and facilities provided have supported my learning well. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.
Make assessments accessible.	• NSS 8. The criteria used in marking have been clear in advance. • NSS 9. Marking and assessment has been fair. • NSS 10. Feedback on my work has been timely.

Table 95: Kent University Key Performance Indicators and potential influence on responses to NSS questions	
Key Performance Indicator	**Potential effect on NSS numbered questions**
	• NSS 11. I have received helpful comments on my work.
Promote productivity tools (assistive technologies) to everyone.	• NSS 18. The IT resources and facilities provided have supported my learning well. • NSS 20. I have been able to access course-specific resources (e.g. equipment, facilities, software, collections) when I needed to.

Kent's analysis demonstrated that these KIPs-related initiatives would have a limited impact on the responses to the NSS questions used in TEF's evaluation methodology which uses only NSS questions 1-4; Question 1 was only mentioned a single time as being potentially influenced.

Even the subsequent TEF cycle, 2018, aimed at subject level rather than institutional level assessment, did not embrace a metric relating to inclusive teaching selecting, as previously, Questions 1-4 on the NSS which are unrelated to inclusive teaching (OfS, 2018e). On current form, the TEF will likely continue to fail to provide HEPs with an explicit intent to embrace inclusive practices.

Nevertheless, three points are worth noting. First, NSS Question 20, did ask respondents to adjudge accessibility, which might have provided insight into disabled students' experiences, but this question was not included in TEF's assessment of teaching quality or learning environment. Second, the above Kent analysis identified Question 20 as potentially being influenced by eight of its nine KPI activities. Lastly, as the data gathered in the 2018 subject level TEF included disability status, some future TEF results could potentially shed some light on the experience of disabled students were question 20 to be included in the metric and were TEF data published with the ability to analyse by disability status.

20.   Appendix 14: FOIR2 validation method in decreasing order of specificity

Validation category	Requirement examples given by respondents [Verbatim quotes]
Respond to a checklist which specified the HEPs' expectations for inclusivity, 9% (6 of 70)	All programmes to have Equality Impact Assessment. Questions to include: a. Syllabus addresses protected groups appropriately? b. What elements of the content may have an impact on any of the diversity groups? c. Have the course team had training on diversity and inclusion … in the last 3 years? d. What adjustments made to course that anticipates the access requirements of disabled students? e. All materials be available in advance for students to adapt as appropriate? f. To what extent do teaching and tutorial staff employ inclusive teaching and learning approaches to ensure that all learners benefit fully from the delivery of the programme/module? g. How will the delivery team ensure that students with specific access requirements (physical or otherwise), are recognised and supported in a timely manner? In the Curriculum Design Framework the curriculum should: a. be accessible to all learners, b. promote awareness of equality, diversity and inclusivity in course content and in learning activities; prepare students to promote inclusivity in their professional lives. In Periodic review: a. To ensure that teaching, learning, inclusive practice, e-learning and assessment strategies are appropriate, and enable all students to achieve the learning outcomes for the course(s), b. To ensure articulation with University policies such as the Learning and Teaching Strategy, the Assessment policy, inclusive practice guidance and the baseline e-learning requirements, c. Courses should also be reviewed to ensure that as many diverse learners are accommodated and supported as possible by adopting inclusive practice in course design, delivery and assessment and move away from ad hoc individual adjustments. Guidance on inclusive practice is provided in the University's Inclusive Practice Toolkit. In Course approval: a. Inclusive curricula, teaching, learning and assessment methods enable students to reach an appropriate standard to achieve awards, b. Inclusivity of all students is considered and specific student support arrangements are in place.

Validation category	Requirement examples given by respondents [Verbatim quotes]
Describe how their courses achieved inclusivity, 14% (10 of 70)	Comment on inclusivity of curriculum is requested as part of the validation proposal documentation. The periodic review document asks how the course has supported students in progression and achievement over the period of review, how the course ensures inclusivity and equality & diversity, and asks about approaches to learning & teaching and related specific data. Each panel is asked to confirm that the course ensures inclusivity in assessment. Each year the [academic review] process includes an annual enhancement theme which provides a mechanism for evidence-based investigation into aspects of the Learning & Teaching Strategy or other key curriculum drivers. In AY2016/17 the annual enhancement theme was focused solely and explicitly on Inclusive Teaching and asked all programme teams to provide a commentary on how the School addresses the theme: 'What strategies do you employ that explicitly include all learners and are designed in such a way that they may achieve their full potential?'
Provide a statement that their courses were inclusive, 21% (15 of 70)	At periodic review, convenors are currently asked to include evidence on the extent to which the curriculum offers inclusive opportunities; and the extent to which the needs of specific categories of student – for example in terms of disability, gender, ethnicity and age – are addressed and supported. It is a minimum requirement that the one set of Departmental meeting minutes be submitted which show attendance by the Diversity Advisor, and discussion of issues of equality in curriculum design. Have gender, race, disability, age and any other equality issues been taken into account when planning this programme? Please ensure that both staff and student equality issues have been taken into account. For example: Please consider and provide assurance as to how diverse and representative content is embedded in the curricula of the new programme/programme changes.
General compliance with HEPs' inclusivity policies and procedures, 56% (39 of 70)	Panel considers the approach to inclusive practice in both the curriculum, and teaching practice. Class-based teaching is supported by comprehensive VLE materials allowing students to work at their own pace. There is a system of personal advisors for first and second year UGs to support learning; The Student Support Service is responsible for setting up and monitoring SpLDs. Students with SpLDs are allowed extra time in written exams. We do not specifically measure implementation. Course content and teaching methods acknowledge the diversity of the student cohort.

21. Appendix 15: Researcher's academic publications during, and based on, this research

Academic Conference Papers Delivered & Associated Workshops

Date	Title	Conference
4/2015	A Problem with Propositional Logic. Case study	*Dyscalculia: Mist, Haze, Shutters.* Loughborough University.
6/2016	Gaining confidence supporting science & technology learners.	*Annual Conference.* ADSHE
6/2016	Busting the Barriers to Inclusive Learning Environments.	*Annual Conference.* NADP
4/2017	Handling Cognitive Diversity: Ideas for EAP Teachers. (Joint: C. Healey. American University in Richmond)	*Annual Conference.* BALEAP
6/2017	Sisyphus or Hercules. Implementing Inclusive Teaching and Learning Environments.	*Annual Conference.* NADP
6/2018	Patterns Not labels. Diversity for Everybody, Achievement for All (Joint: Osborne A, Bath University)	*International Conference*. NADP
5/2019	Operationalising Inclusive Teaching: How do we turn goodwill into meaningful and lasting good practice? (Joint: B. Watson, Kent University)	*Student Experience & Progression.* Staff and Educational Development Association (SEDA)
5/2019	Your Class of 2020: How to anticipate & meet its students' inclusive learning needs through practical mainstream interventions. (Joint: B. Watson, Kent University)	*An inclusive experience for disabled students in HE?* Swansea Academy of Inclusivity & Learner Success
6/2019	Motive, Means & Opportunity: Difficulties and opportunities in operationalising inclusive teaching for ASC students. (Joint: L. Herbert, De Montfort University)	*Annual Conference.* NADP

Published Work

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Newman, I., Conway, J., 2016. The Nature of an Inclusive Learning Environment. *Journal of Inclusive Practice in FE & HE,* Issue 7, pp. 100-111. [https://nadp-uk.org/wp-content/uploads/2015/02/JIPFHE.ISSUE-7.pdf]

Newman, I., Conway, J. 2016. An Evaluation of Specialist One-to-One Study Skills Tutorials. *Journal of Neurodiversity in Higher Education*. Volume 1, Issue 2, pp. 8-22. [https://drive.google.com/file/d/1Rg05rnGVsLSUiKE_U35mIl3JKFpzfHeC/view]

Newman, I., Conway, J. 2016 & 2017. Busting the Barriers to Inclusive Learning Environments. *Journal of Inclusive Practice in FE & HE.* Issue 8, pp. 30-35. [https://nadp-uk.org/wp-content/uploads/2016/11/JIPFHE.ISSUE-8-Spring-2017.pdf]

Newman, I., Conway, J. 2017. Delivering Specialist Study Skills Tutorials via Remote Working Tools. *Journal of Neurodiversity in Higher Education.* Volume 1, Issue 3, pp. 34-58. [https://drive.google.com/file/d/0B1j7dkdLO6PhcnNDRWNpUS1FQkU/view]

Newman, I., Conway, J. 2017. Sisyphus or Hercules. Implementing Inclusive Teaching and Learning Environments. *Journal of Inclusive Practice in FE & HE.* Issue 9, pp. 44-62. [https://nadp-uk.org/wp-content/uploads/2017/11/JIPFHE.ISSUE-9.1-Winter-2017.pdf]

Newman, I., Healey, C. Osborne, A., Newman, V. 2018. Patterns Not labels. Diversity for Everybody, Achievement for All. *Journal for Inclusive Practice in FE & HE*. Issue 10.1, pp. 80-105. [https://nadp-uk.org/wp-content/uploads/2019/01/JIPFHE.ISSUE-10.1-Winter-2018-1.pdf]

Newman, I. 2019. When Saying "Read it again" Won't Work. *Nursing Education in Practice*. Vol 38, pp. 12-16.

Newman, I., Conway, J., 2019. Inclusive teaching: From back seat to driving seat? PATOSS Journal, Vol 32, No1, pp. 22-41. [https://www.patoss-dyslexia.org/Resources/bef4e69b-e652-4ec2-b026-9e3f3b560a70]

Newman, I., Herbert, L. 2019. Working with Course Leaders: Ideas for Operationalising Inclusive Teaching - Autism Spectrum Condition (ASC) [https://nadp-uk.org/wp-content/uploads/2019/12/JIPFHE.ISSUE-11.2-Winter-2019-1.pdf]

Newman, I., Watson, B. (In preparation). Does technical accessibility equal student satisfaction? Implications for inclusive teaching. [Journal for Inclusive Practice FE & HE]

22. Appendix 16: Glossary

Term	Definition
ADD/ADHD	Attention Deficit Disorder/Attention Deficit & Hyperactivity Disorder.
ADSHE	Association of Dyslexia Specialists in HE.
Advance HE	Organisation whose charitable aim is to "support strategic change and continuous improvement through the development of individuals and organisations of higher education" (Advance HE, n.d.a).
ANMHP	Association of NMH Providers.
Access and Participation Plans (APP) Previously known as Access Agreements	Access and participation plans set out how higher education providers will improve equality of opportunity for underrepresented groups to access, succeed in and progress from higher education. They include: 1) The provider's ambition for change, 2) What it plans to do to achieve that change, 3) The targets it has set, 4) The investment it will make to deliver the plan (OfS, 2018b).
ASC/ASD	Autistic Spectrum Condition /Disorder https://www.autism.org.uk/about.aspx
AST	Applied Systems Thinking.
AT	Assistive Technology.
AY	Academic Year, eg AY2016/17.
BAME/BME students	Students from Black, Asian, Minority Ethnic/Black, Minority Ethnic backgrounds. https://dictionary.cambridge.org/dictionary/english/bame
BIS	Department for Business Innovation & Skills (the HE related areas of which moved to the DfE from July 2016).
Blackboard	A virtual learning environment (VLE) https://www.blackboard.com/en-uk/about-us . See also Moodle.
BSL	British Sign Language.
COVID-19	Coronavirus Disease 2019.
CPD	Continuing Professional Development.
CRM	Customer Relationship Management [system].
Curriculum	"The totality of the undergraduate student experience of and engagement with their…program of tertiary study" (Kift, 2009, p. 9).
DDA	Disabilities Discrimination Act (years specified in citation)
DfE	Department for Education.
Disabilities Support/ Disabilities Teams	Generic terms used to describe departments within HEPs with the responsibility of supporting their disabled students. See also Student Services.
Discrimination	Direct discrimination: "This is when you are treated worse than another person or other people because: a) you have a protected characteristic, b) someone thinks you have that protected characteristic (known as discrimination by perception), c) you are

Term	Definition
	connected to someone with that protected characteristic (known as discrimination by association). Indirect discrimination: "Indirect discrimination happens when there is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic, and you are disadvantaged as part of this group. If this happens, the person or organisation applying the policy must show that there is a good reason for it." https://www.equalityhumanrights.com/en/advice-and-guidance/what-direct-and-indirect-discrimination
DSA	Disabled Students' Allowances.
DSA-QAG	Disabled Students' Allowances-Quality Assurance Group, a charity which worked with part of the Department for Education (DfE), formerly within the Department of Business Innovation and Skills, BIS), and other parties in the "to continuously make improvements for disabled students attending Higher Education institutions during the needs assessment process and the receipt of equipment and services in line with the Quality Assurance Framework (QAF) and the Disabled Students' Allowances (DSAs)." (DSA-QAG, 2016d). Closed in December 2019.
DSSLG	Disabled Students' Sector Leadership Group.
EA	Equality Act (2010).
Equity Group	In this research, an identifiable group which has support needs outside traditional mainstream pedagogy, typically due to disability, ethnicity, socio-economic group. The term originated in Canada's Abella Commission (Abella, 1984) in which four Equity Groups were defined leading to the Canadian Employment Equity Act (1986) [later Employment Equity Act 1995]. In Canadian usage the term is broadly equivalent to the 'protected characteristics' in UK legislation, DDA (1995), SENDA (2001) and EA (2010). In the UK context, such groups are often referred to informally as 'target groups'. See S.2.4 for usage in this research.
ECU	Equality Challenge Unit. Subsumed into Advance He from April 2018.
EDI	Equality & Diversity Inclusion, a post in some HEPs.
ESRC	Economic and Social Research Council
FaceTime	FaceTime is a [free] Apple application that allows users to video chat over the Internet. (TechTarget, 2016(b)).
FE/FEC	Further Education/College.
FOIR	Freedom of Information Request made under the terms of the Freedom of Information Act (2000).
FYE First Year Experience	An Australian initiative aimed at improving retention and progression based upon the idea of ensuring students' first year of transition to HE was successful (Kift, 2009); (Kift & Nelson, 2005); (Kift, 2015). See also Transition Pedagogy (TP).
GDPR	General Data Processing Regulation (GDPR, 2016/679).

Term	Definition
GoConqr	GoConqr is a [free] personal learning environment that allows students & teachers to create, discover and share learning resources. (GoConqr, 2016).
Google Docs	Google Docs is a free Web-based application in which documents and spreadsheets can be created, edited, shared and stored online. (TechTarget, 2016(e))
Google Hangouts	Google Hangouts is a [free] unified communications service that allows members to initiate and participate in text, voice or video chats, either one-on-one or in a group. (TechTarget, 2016(c)).
GoTo Meeting	A virtual meeting room … which allows a meeting organizer to invite attendees from disparate geographical locations to collaborate in real time over the Internet. (TechTarget, 2016(d)). [GoTo Meeting for up to 3 people is a free service].
HE	Higher Education.
HEA	Higher Education Academy (subsumed into Advance HE in 2018).
HEFCE	Higher Education Funding Council for England (subsumed into Office for Student (OfS) in 2018).
HEP/HEI	Higher Education Provider/Higher Education Institution. For consistency, throughout this document the abbreviation HEP has been used, even where original documentation used the term HEI.
HESA	Higher Education Statistical Agency.
ICO	Information Commissioner's Office.
ILE	Inclusive Learning Environment.
Inclusive practices	The range of practices implemented by an HEP to make the institution physically and academically accessible to a diverse range of Equity Groups.
IITL	Institute for Inclusive Teaching & learning. A proposal in this thesis, see S.6.3.
ILE	Inclusive Learning Environment, the outcome of an HEP implementing Inclusive teaching and Learning.
ITL - Inclusive teaching and learning	One element of inclusive practices aimed at designing and implementing pedagogy to address the needs of a diverse range of Equity Groups. It includes, but is not limited to, understanding of the needs of different Equity Groups, training for academics in how to design and deliver inclusively, creation and delivery of inclusive courses, validation of courses against inclusive criteria, inclusive assessments. Definition: "Inclusive learning and teaching in higher education refers to the ways in which pedagogy, curricula and assessment are designed and delivered to engage students in learning that is meaningful, relevant and accessible to all. It embraces a view of the individual and individual difference as the source of diversity that can enrich the lives and learning of others" (Hockings, 2010).
Individualised model of disability	The idea that an individual's impairment is the cause of their disability and that the impairment can in some way be treated using a medical approach to restore the person to 'normality'.

Term	Definition
Also known as the medical(ised) model	Conversely, the social model of disability sees society's response to the impairment as the cause of disablement (The Union of the Physically Impaired Against Segregation & The Disability Alliance, 1975); (Oliver, 1990); (Oliver & Sapey, 2006).
Jisc/JiscMail	JiscMail is the national academic mailing list service, provided by the Joint Information Systems Committee (Jisc). Jisc is a not-for-profit organisation providing the UK higher, further education and skills sectors with digital services and solutions. https://www.jiscmail.ac.uk/about/whatisjiscmail.html
KPI	Key Performance Indicator.
LEA	Local Education Authority. Responsible for student loans and grants up to AY2008/9.
MH	Mental Health.
NADP	National Association of Disability Practitioners.
NMH	Non-Medical Help, eg Mentor or study skills support.
NMH QAF	NMH Quality Assurance framework issues by DSA-QAG.
NSS	National Student Survey. https://www.thestudentsurvey.com/
Medical[ised] model of disability	See Individualised model of disability.
MH	Mental health.
Moodle	"Moodle is an acronym for "Modular Object-Oriented Dynamic Learning Environment." It is an online educational platform that provides custom learning environments for students." https://techterms.com/definition/moodle . Moodle is open source. A proprietary equivalent is Blackboard https://www.blackboard.com/en-uk/about-us. Both Moodle and Blackboard are Virtual Learning Environments (VLEs), see below.
NMH/ NMH provider/ NMH support worker	Non-Medical Help – a generic term to describe categories of support of a non-medical nature (eg study skills support) given to students under Disabled Students Allowance/ an organisation whose object is the delivery of NMH support either through its employees or 3rd parties contracted to it / an individual delivering NMH support for an NMH provider.
OFFA	Office for Fair Access (subsumed into OfS in 2018).
OfS	Office for Students.
OU	Open University.
PATOSS	Professional Association of Teachers of Students with Specific Learning Difficulties.
PDF	Portable Data Format [file].
PGCHE/PGCCAP	Post Graduate Certificate in Higher Education/Academic Practice.
POLAR	The participation of local areas (POLAR) classification system groups areas across the UK based on the proportion of the young population that participates in higher education

Term	Definition
	https://www.officeforstudents.org.uk/data-and-analysis/young-participation-by-area/.
Post-1992/ pre-1992 HE providers	Pre-1992 HEPs were those which existed prior to the Further and Higher Education Act 1992 which expanded the HE sector by allowing former polytechnics and other types of educational institutions to take university status https://academiccareermaps.org/glossary/post-1992-universities.
PSED	Public Sector Equality Duty under the EA (2010) (UK Government, 2010).
PSF/UKPSF	UK Professional Service Framework. The three-element model underlying the HEA's Fellowship Scheme.
PTSD	Post-Traumatic Stress Disorder.
QAA/QAA QC	UK Quality Assurance Agency and associated [UK] Quality Code
QA	Quality Assurance.
QAF	Quality Assurance Framework published by DSA-QAG.
REF	Research Excellence Framework.
Remote NMH support	The term used by DSA-QAG to describe a Specialist Study Skills tutorial delivered using an RWT (DSA-QAG, 2016a, p. 17).
RWT	Remote Working Tool. Generic term for technology which enables parties to collaborate at a distance typically using real-time video, audio, text messaging, screen-sharing and file exchange. Examples: Microsoft Skype, Apple FaceTime, Google Hangouts, Zoom.
SAAS	Student Awards Agency Scotland.
SEDA	Staff and Educational development Association.
SENDA	Special Educational Needs and Disabilities Act (2001) (UK Government, 2001)
SES	Socio-Economic Status.
SFE	Student Finance England, a subsidiary of SLC, see immediately below.
SFNI	Student Finance Northern Ireland.
SFW	Student Finance Wales.
SIS	Study Information Sheet.
Skype	Free to use videoconferencing, file transfers, texting, and video-chat (TechTarget, 2016(a)).
SLC	Student Loans Company.
SO	Student Opportunity [fund].
Social model of disability	See Individualised model of disability, above.
SpLDs	Specific Learning Difficulties, eg dyslexia, dyspraxia, ADHD.
Specialist Study Skills tutor	A type of NMH support worker who delivered support to disabled students regarding study skills.
SS(A)FA	Soldiers', Sailors' (and Airmans') Family Association
Student Services	Generic terms used to describe departments within HEPs with the responsibility of supporting their disabled students.

Term	Definition
Student Wellbeing Services	See immediately prior item.
STEM/STEMM subjects	Science, Technology, Engineering, Mathematics/ Science, Technology, Engineering, Mathematics and Medicines. See https://royalsociety.org/topics-policy/diversity-in-science/destination-stemm/ and https://royalsociety.org/topics-policy/diversity-in-science/topic/
SWAN	[Athena] Senior Women's Academic Network equality charter. See https://www.ecu.ac.uk/equality-charters/athena-swan/
TASO	Transforming Access & Student Outcomes. See https://taso.org.uk/
Teamviewer	Subscription-based online meeting, file sharing, screen sharing application. (TeamViewer, 2016).
TEF	Teaching Excellence Framework.
TP/Transition Pedagogy	A term used in Australia to describe focusing on students First Year Experience as a way of improving retention (Kift, 2009).
UCAS	University & Colleges Admissions Service.
UDL	Universal Design for Learning. "Universal design for learning (UDL) is a framework to improve and optimize teaching and learning for all people based on scientific insights into how humans learn". UDL's three tenets are that educators should provide multiple means of engagement, representation, and action and expression. http://udlguidelines.cast.org/?utm_medium=web&utm_campaign=none&utm_source=cast-about-udl
UKQC	QAA UK Quality Code.
UKPSF	See PSF.
UKRI	UK Research & Innovation. Se https://www.ukri.org/
VLE	Virtual Learning Environment (eg Moodle or Blackboard, see above entries).
WI	Whole Institution.
WP	Widening Participation.
WPSA	Widening Participation Strategic Assessment.

23.   Bibliography

Notes:

1. DSA-QAG ceased operations at end 2019. Its documents were not preserved either by a successor organisation (of which none) or DfE. In this bibliography all DSA-QAG documents are referenced by their original URLs as a matter of academic integrity although these links, if clicked will result in a *Page Not Found* error message,

2. HEFCE/OFFA ceased to exist in March 2018 when they were absorbed into OfS. Some of their documents migrated to the OfS website, others, the majority, were archived at the National Archive. URLs are provided into both databases as appropriate. Searching for relevant HEFCE/OFFA documents within the National Archives is significantly more cumbersome that when they were hosted by HEFCE/OFFA themselves,

3. Where a number of references are used from the same website, but none of them carry a date, they are referenced sequentially as n.d.a, n.d.b, n.d.c etc. in order to distinguish between them.

4. Microsoft Word's referencing tool is used in this thesis. Whilst the Harvard Anglia option was selected, in some minor ways the software is not completely faithful to the Harvard-Anglia specification. For example, if a question mark is included in a document's title, the referencing tool places a full stop after the question mark when it creates the bibliography. Additionally, rather than multiple references appearing within a single set of parentheses, multiple references are presented each within its own set of parentheses, separated by a semicolon.

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