

## Support for part-time and disabled students consultation: Universities Scotland response

### Part 1 – Support for part-time / distance learning study

1. If you represent or work for an education provider, do you provide further education courses (up to SCQF level 6) or higher education (HNC / HND / undergraduate or postgraduate degree)? [\[this link will direct to the Scottish Credit and Qualifications Framework website\]](#)

- ☐ Further education
- ☐ Higher education
- ☐ Both further and higher education

Universities Scotland is the representative body for Scotland's 19 higher education institutions. Our response is also supported by AMOSSHE Scotland members (<https://www.amosshe.org.uk/>).

Our members provide higher education from SCQF level 7 to SCQF level 12. Our members offer traditional UG and PG programmes however also provide a wide range of short courses across all SCQF levels.

Our students and learning provision are diverse. HESA data<sup>1</sup> shows that in AY 23/24 there were:

- 281, 445 learners from all domiciles studying at all levels and modes of study across all Scottish providers.
- 70% of these learners were studying at UG level (SCQF Level 7 to 10), 30% at PG level (SCQF Level 11 -12).
- 106,545 Scottish domiciled students were studying at full time first-degree level (FTFD).
- 17, 515 Scottish domiciled students were studying at part time first-degree level (PTFD).
- 8,215 Scottish domiciled students were studying at full time postgraduate taught level (FTPGT).
- 17, 510 Scottish domiciled students were studying at part time postgraduate taught level (PTPGT).

Part time students are more likely to be older than full time students.

- 58% of FTFD Scottish domiciled students were aged 20 and under but 62% of PTFD Scottish domiciled students were aged 30 and over.
- 48% of FT PGT Scottish domiciled students were aged 21-24 years but 78% of PT PGT Scottish domiciled students were aged 30 and over.

Additionally, 5,710 learners articulate from college to university each year<sup>2</sup>. These learners are transitioning from a college into university with an HE qualification but where student support teams offer advice to a broader range of students and where discretionary funds are managed differently. Many students also gain university entry through a SCQF Level 6 course, such as SWAP (Access Programme) at a college and have experience of the financial support that is available to FE students at college compared to HE students at college or university.

Our members also deliver work-based learning opportunities, for example Graduate Apprenticeships, where students are full time however spend part of the week in a workplace.

<sup>1</sup> HESA Open data and statistics, Who's studying in HE? <https://www.hesa.ac.uk/data-and-analysis/students/whos-in-he#numbers>

<sup>2</sup> SFC 2022/23 Widening Access Report, table 14 a <https://www.sfc.ac.uk/publications/report-on-widening-access-2022-23/>



It will be important to ensure the needs of all these students are considered holistically when reviewing any changes to student support.

2. If you represent or work for an education provider, do you provide part-time or distance learning study options?

☐ Yes

☐ No

If 'no', can you please tell us why this is the case??

☐ Not compatible with the organisation's preferred study model

☐ Not commercially viable

☐ Not sufficient student interest

☐ Other

We think it is important to separate out our response by answering first on part time study options and then by distance learning study. This is because the provision is delivered differently by each institution, for varying reasons. It will also vary depending on the SCQF level and the number of credits available.

We are also keen to note that definitions of part time study are challenging as it is measured differently by different external bodies. Without a clear definition, it can be challenging to predict impact.

Members also note that they have previously submitted feedback over a number of years to SAAS on their work on the PT fee model and it is unclear how or if this will feed in to the current consultation. It will be helpful if SG could clarify how this feedback may be reviewed as part of this consultation so that previous work is not lost.

### Part time study

The Open University in Scotland is the largest provider of part time higher education in Scotland. Over 50 per cent of Scottish domiciled students studying part time UG do so at the Open University (OUiS). However, part-time students are not solely at OUiS.

In 2023-24, 30% of all Scottish domiciled students in Scotland were studying part time: 32.4% of PG research students, 68.1% of PGT students (including 58.7% of Masters students) and 23.6% of undergraduate students (14% of first-degree students). It is notable that in PGT, part time is more common than full time study.

Most universities offer a range of different flexible options at PG level. Some PGT courses are set up as part time only, others offer dual entry routes for full time and part time. As above, the majority of PGT students are studying part time.

Most universities offer part time options on undergraduate courses, although often there are fewer part time options than full time options because of, for example, timetabling constraints and demand. The current funding model has a significant incentive to study full time rather than part time at UG level, which can push people to study full time. Part time options can also sometimes be available for continuing students to allow people to move from full time mode, which can give additional time to complete depending on personal circumstances.

As well as degree programmes, universities run short courses which could be considered part time as many will run for a number of weeks with an indicative number of study hours. These are available at all SCQF levels. In fact, almost all students studying for institutional credit at PGT or UG level are studying part time.



## Distance learning

Distance learning can be available for full time or part time study across all SCQF levels. In 2023/24<sup>3</sup>, 850 people based in the UK studied a UG first degree full time by distance learning at a Scottish provider compared to 13, 985 who did this part time (12,870 were at the Open University). 305 people based in the UK studied at PGT degree level full time, compared to 15,460 who did this part time (1,250 were at the Open University).

We think it will be important for SG to specify which SCQF level, type of course, credits and mode of study when reviewing any different support options for distance learning.

3. Do you think that support for part-time and distance learning study needs to be simplified? Yes/No YES

Can you please explain further the reasons for this?

## Part time students

We welcome the consultation and opportunity to respond. It would perhaps be helpful to be clear about whether any proposed changes will apply to part time UG and/or part time PGT in this consultation.

We think that the support for part time UG students needs to be both simplified and enhanced. UG students wanting to study part time have to apply through a separate scheme that is not linked to FT UG support. This is opposite to the system for PG students where PT and FT PG students can apply for support through the same system. This is a much more simplified approach.

The threshold for the PTFG has not been increased since 2013/2014 and the student finance review recommended student maintenance support for part time (UG) students in 2017. Many students studying part time are balancing work, caring responsibilities, or other commitments alongside their education and simplifying support would help widen access and reduce inequalities. There is also a disparity that is not explained to learners as to why FT UG learners can access tuition fee support that is not income assessed but where PT UG students must apply for tuition fee support where personal income is assessed.

The current model also creates cliff-edges to support – where there are binary boundaries (on e.g. salary level) where support is removed 100%. This reduces flexibility and increases the risk of non-completion, which represents a significant impact on the individual but also a diminished return on the investment of public funds.

Some of our members have commented on the lack of flexibility for UG students in the current funding model which has large perverse incentives to study full time, regardless of whether that is the best option for the student.

There is also a discrepancy in how part time students are viewed for funding purposes. SAAS considers students studying between 30 and 119 credits to be part time however full time degree courses are 120 credits. This does not seem fair and should be reviewed.

The *Student Finance and Wellbeing Survey Scotland 2023/24* highlighted that information about, and communications on, financial support available to part time undergraduate and postgraduate students is lacking. The survey also highlighted student views that education-related income (bursaries and/or loans) is inadequate to cover the basic costs of student life. Some FE and part time students also expressed worry at the thought of taking on loans for maintenance however anxiety reduced when repayments were explained. Improved communications on how student finance works from application to repayment would be helpful and help remove barriers.

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<sup>3</sup> Table 63, HE student enrolments by HE provider and distance learning marker 2022/23 to 2023/24 <https://www.hesa.ac.uk/data-and-analysis/students/table-63>



Given the range of different study options now available at university, it is important that advice and guidance is updated and simplified. With an aging workforce and the increasing need for people to upskill or reskill over the course of their working lives, we think there is a need to look at reviewing funding arrangements. There would also be merit in looking separately at support for upskilling courses more broadly, including the costs of the courses.

We also think it would be helpful to see SG analysis of introducing any maintenance support for part time students and how this might stimulate demand for these types of provision and how this would be affordable.

It is also important to consider any unintended consequences. We note that when England introduced enhanced support for UG part time students in the form of tuition fee loans, demand for UG part time study in England fell significantly because the change raised tuition fees.

Any changes to the support of part time students would also need to be adequately funded so that there was no impact on the current funding available for full time UG students and no adverse impact on benefits entitlements.

We believe support for part time PGT students (which is currently pro rata to full time PGT support) should be looked at in the context of PGT student support for part time *and* full time students.

#### Distance learning

We think there would be merit reviewing support available to all distance learning students whether part time or full time with clarity on how this would apply to UG and PG learners. Current arrangements assume that all distance learning is part time, and it can be difficult for learners to compare what support is available to best suit their circumstances. Again, it will also be important to consider and avoid any unintended consequences, especially in encouraging uptake of one mode of study over another when it might not be in the learner's best interests.

4. If you represent or work for an education provider, apart from student financial support packages funded by the Scottish Government, what other financial and wider institutional support does your college or university offer part-time/distance learning students?

We do not intend to answer this question as we are not a provider.

5. If you represent or work for an education provider, do you think that the introduction of living cost support (bursaries and/or loans) for part-time / distance learning study might affect your institution's course provision? Yes/No

If 'yes', please tell us what effect this might have? Free text

We do not intend to answer this question as we are not a provider.

6. The introduction of living cost support for part-time or distance learning study would mean the same eligibility criteria being used as it is for full-time study. Do you agree with this? Yes/No

If 'no', can you tell us why you think eligibility criteria between full-time and part-time / distance learning study should be different? Free text

We are generally supportive of the introduction of living cost support for part time students and move towards parity with full time but are wary about any unintended consequences.

Potential benefits include:

- It could support widening access to HE
- It could make it easier for students to identify information that is relevant to them and plan appropriately
- It may stimulate further demand for part time study



- It would remove barriers for those who would like to study but can't currently afford it – we know some part time students currently face a barrier if they get a promotion at work and no longer qualify for the PTFG
- Potentially expand range of course provision (especially shorter courses for retraining/upskilling for the economy)

It may also improve progression and retention as students may not need to take on additional hours in additional work to make ends meet. On the other hand, it matters how this is implemented:

- It is important that this does not move funding from SFC (e.g. unit of resource for teaching) to pay for this because finances are already stretched for the university sector
- It is important that this does not reduce the existing amount available to full time students. We know from the Student Finance and Wellbeing Survey that some full time students already struggle with the current level of support, and we should not exacerbate these issues
- Care would also need to be taken in any move to household income rather than personal income as this may impact older learners who are more likely to consider part time learning to fit round work or care responsibilities
- It is important to consider whether any change in support would impact benefits eligibility. It would introduce a new barrier to learning if it meant people were no longer eligible.
- Care would need to be taken to understand how any existing institutional data sharing arrangements with SAAS may be impacted as these can currently identify students with contextual flags such as care experienced or estranged status where additional institutional scholarship or bursary support may be available.

7. Further education students can get their fees paid (this is called a fee waiver) or can get some support towards fees depending on their circumstances. Access to this support is subject to eligibility criteria which can include a means-test.

What are your views on this approach?

We do not intend to answer this question.

8. What (apart from the PTFG) do you think would help to further improve support for part-time and distance learning students in HE? Free text

We think access to living cost support for part time students would be helpful. It would allow a wider group of people to consider studying. Some people who choose to do this may be career changers looking to reskill/upskill in new areas of the economy and may be incentivised to do this if loan eligibility requirements are flexible on previous study.

We think part time students should be eligible for the care experienced bursary. Care experience is a national widening access metric for full time UG learners but is only available to full time students. We also think that part time students should also be eligible for the Estranged Students' Bursary.

9. Do you feel the current eligibility criteria for the PTFG work on focusing support for students who need it the most? (SG has focused support for students on low income to access HE through the PTFG, which is accessible for those with personal incomes of under £25k.) Yes/No

Can you explain the reasons for your answer? Free text

We agree with the general focus on supporting those with low incomes. However, the threshold for PTFG has not increased since 2013/14 and therefore it supports a smaller group of people than the original policy intent. SG should review the income threshold for eligibility, however, with a view to increasing it significantly, given that it has not been reviewed for some time and inflation means that income thresholds have slipped. SG should further commit to regularly reviewing the threshold. The PTFG is especially unfair given that full time students benefit from having their fees paid by SAAS regardless of income and are able to apply for bursary and loan support.



Indeed, the PTFG salary limit of £25k is now close to the UK minimum wage – and in fact, people working 40 hours a week (and aged over 21) will earn over this threshold<sup>4</sup>. We think this means the PTFG is not helping all the people that it should.

We think consideration should be given as to whether ‘personal income’ is the most appropriate measure of need. Assessing personal income can lead to disparity, especially where other people in the household are earning significantly more. If this was to be maintained, we feel consideration should be given to a higher personal income threshold than £25k per annum.

10. Are there any non-monetary improvements relating to support for part-time and distance learning students, not already asked in this consultation, that you would like to comment on?

We think if support is reviewed then this is an opportunity to:

- Improve promotion and communication of support, including explaining how loans and repayments work. This was highlighted in the Student Finance and Wellbeing Survey Scotland 2023/24.
- Promote parity of esteem between part time and full time study. Part time students are often forgotten about but are a significant minority of the student population.

11. Should part-time and distance learning first-degree students be included in the official data measuring progress towards the SG’s target to increase the proportion of SIMD20 learners entering HE? Yes/No

Can you explain the reasons for your answer?

Yes, we believe part time students should count as a point of principle, but we think this would be most appropriate as part of an additional metric, rather than a combined one. However, we also believe there is further work to do on the metrics.

SIMD20 is an important indicator for identifying low levels of qualifications and health disadvantages in communities. However, it is widely recognised that this measure is limited in identifying more individual disadvantage (for all types of learners) and in identifying rural disadvantage. This may therefore make measuring progress on SIMD 20 for part time and distance learners more challenging, especially as part time learners are more likely to be older and distance learners may be more rural.

SG has recognised that more person centred metrics are required to identify disadvantage and although current SG work on free school meal data sharing may help recent school leavers who will be studying part time, it will have limited impact on other part time learners. It is important to consider if any metric will identify current or historic disadvantage as the national measure of SIMD only benefits current disadvantage and as part time learners are more likely to be mature learners, previous disadvantage could be important to understand.

Universities Scotland has recently carried out some work to identify potential metrics for part time and mature learners and will share this separately with SG.

## Part 2 – Support for disabled students

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<sup>4</sup> National Minimum & National Living Wage: What You Need to Know, HR Delivered <https://hrdelivered.co.uk/blog/national-minimum-national-living-wage-what-you-need-to-know>





12. Do you think that support for disabled students in FE and/or HE needs to be simplified? Yes/No

Can you please explain further the reasons for this? Free text

The numbers of disabled students in Scottish universities are significant (data below), and we think that explanation of the support available for different groups could be improved. We note the 2021 findings from the SAAS/SG Review of Disability Related Student Support<sup>5</sup> found that there is a lack of information and guidance relating to disability related student support across FE and HE. We would support SG work to improve advice and guidance for both prospective and current learners.

In 2023/24, 22% of FTFD (UG) students declared disability (33,725 learners<sup>6</sup>). This includes all students, not just Scottish domiciled, as university disability services support all learners with their support needs irrespective of nationality. 28% of all PTFD (UG) students declared a disability (5,100 learners). If these numbers focus on Scottish domicile only, 23% of Scottish FTFD students declared a disability (24,745) and 24% of PTFD (UG) students declared a disability (4,985 learners).

In 2023/24, 9% of all FTPGT students declared a disability (4,040 learners). This includes all students, not just Scottish domiciled, as university disability services support all learners with their support needs irrespective of nationality. 16% of all PTPGT learners declared a disability (4,135). If these numbers focus on Scottish domicile only, 24% of all FTPGT students declared a disability (1,995 learners) and 17% of PTPGT students declared a disability (2,895).

In (Scottish) schools, support for students with disabilities is needs-based and does not depend on a diagnosis. However, access to DSA and other types of support at university depends on having a (medical) diagnosis. This can come as a surprise to new university students and can delay claims for DSA and therefore support for students, which will impact on their studies. Whilst these differences may be necessary, if they are in place, it is imperative that students, teachers, parents and advisers are aware of the differences. This will help with managing expectations and ensuring timely support.

It is also critical that students have access to a diagnosis. Increasingly, there are long waiting lists for assessment, and, in some cases, diagnostic pathways have closed. Whilst private diagnostic assessments are available, there is often a significant cost attached which is not accessible to everyone. This could result in students not being able to access the support that they need, which could impact on their studies or even mean they cannot access university study. Whilst some universities can sometimes provide some support here, they are not a medical service, and their own budgets are increasingly tight. We believe there is a need to consider how this works.

Retention rates for disabled students (88.6% for Scottish domiciled UG in 2023/24) are consistently lower than non disabled learners<sup>7</sup> and it would be helpful to better understand the reasons for this as financial support could be a factor.

13. If you represent or work for an education provider, what financial and wider support can be accessed by disabled students studying with you?

We do not intend to answer this question as we are not a provider.

14 . Do you find that disabled students' decision on whether to study full or part-time is affected by the level of financial or wider institutional support available?

☐ Yes

☐ No

<sup>5</sup> <https://www.saas.gov.uk/files/676/saas-disability-related-student-support-summary-report.pdf>

<sup>6</sup> <https://www.hesa.ac.uk/data-and-analysis/students/whos-in-he#characteristics>

<sup>7</sup> SFC Report on Widening Access, Figure 3 <https://www.sfc.ac.uk/publications/report-on-widening-access-2023-24/>



If 'yes', please tell us what evidence you have and what examples of impact you are aware of.

Disabled learners are not a homogenous group, and each person will have individual needs. This will determine how much financial or wider institutional support a disabled person will need.

Currently the funding system effectively prioritises full time support and whilst we do not have figures for disabled students in relation to choice of mode of study, it would be unlikely to NOT have an impact on these student groups. There is currently an approximate even split between disabled people studying full time and part time at UG level (data above), but we do not know how their disability impacts their study choice and whether more would choose part time if the funding model were to change.

Part-time students are only eligible for DSA if they are studying at least 50% of a full-time course. This means there is a gap for students studying at a lower intensity. This is a problem, particularly is students need to study at a lower intensity because of their disability. We know that effective transitions to university are an important factor. We agree with the recently published National Transitions to Adulthood Strategy for Young Disabled People that transition support includes clear and accessible information and coordination of support. Our universities aim to do this and we have recently published a [guide for disabled applicants](https://www.universities-scotland.ac.uk/publications/disabled-applicants-guide/)<sup>8</sup> to help better navigate and understand the application process to university in Scotland. The guide recognises universities and higher education institutions across Scotland have different admissions processes and student support services, and how this can make it more difficult for disabled applicants to access the information they need. <https://www.universities-scotland.ac.uk/publications/disabled-applicants-guide/>

We also think that it is important that any changes to financial support this does not move funding from SFC (e.g. unit of resource for teaching) to pay for this because finances are already stretched for the university sector.

15. What improvements do you feel could be made to the administration of support for disabled students in HE? (DSA is administered by SAAS based on the recommendations of the Disability Adviser following a needs assessment.)

We think there is an opportunity to review the DSA application process. The Finance and Wellbeing Survey showed that one of the reasons why learners did not apply for DSA was not knowing that the support was available and not knowing if they would be eligible for it. Students who completed the application without support found it long and repetitive. We therefore think that communications to promote and explain the support available could be improved. It may also be helpful to review the application form and process.

It would also be helpful to provide clear guidance for new students on the type of diagnostic evidence that is required to apply for DSA. We note from the Student Finance and Wellbeing Survey that the volume of evidence required and the difficulty of collecting some evidence was also problematic for some. Students described the experience of providing evidence for their applications as 'stressful.' As above, this is also a different process to (Scottish) schools, which could be confusing for those students progressing from school.

It would also be helpful to publish clear, student-friendly guidance on the process and timeline recognising that new students and their advisors may be approaching this situation for the first time.

Due to the evidence thresholds for DSA, money that comes from discretionary funding for costs of obtaining a diagnosis then passes back to SAAS. We think that this is an unnecessary administrative burden.

A revised model for the administration of support for disabled students should enable Scottish universities to:

- support disabled students in a smooth transition within the learner journey from school to further education and on to higher education through improved communication

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<sup>8</sup> Supporting disabled learners applying to university in Scotland, Universities Scotland, <https://www.universities-scotland.ac.uk/publications/disabled-applicants-guide/>





- support universities capacity to fulfil their anticipatory duties under the Equality Act, e.g. through greater investment in on-campus and loan provision of hardware and software, establishing a national resource technology library for demonstration and trial purposes, investment in NMPH provision etc.
- respond to changing demographics within our universities, including an increase in demand from students with mental illness, who are autistic, or have complex/comorbid disorders, and those students whose studies are not only impacted by disability, but also by intersectional issues including social/economic deprivation. It should also support a move away from a strictly medical model of entitlement to support.
- meet students' needs from the point of identification, rather than potentially having to delay until external funding is secured.
- streamline time-consuming, resource intensive and expensive processes, inherent in the current annual individual student allowance model
- meet the costs of supporting students who are BSL users, by lifting the arbitrary NMPH annual allowance funding caps. This is particularly important following the introduction of the BSL (Scotland) Act, from which we anticipate future increases in Deaf learners progressing to higher education.
- ensure that support is appropriate and tailored to the institution's particular character and geographical location(s) – i.e. recognising that support must be tailored not only to an individual student's needs, but also to the context in which they study.
- enable universities to meet the needs of all its student populations, including students on short courses, studying less than 50%, RUK and international students.

16. If you represent or work for a college or university, do you carry out in-house needs assessments for disabled students who are applying to access DSA in Scotland?

☐ Yes

☐ No

If 'no', who provides

We do not intend to answer this question as we are not a provider.

17. If you represent or work for a college or university that supports DSA students, how long does it typically take DSA applicants to undergo a needs assessment once they have been referred?

☐ 1 to 2 weeks

☐ 2 to 4 weeks

☐ 1 to 2 months

☐ Over 2 months

We do not intend to answer this question as we are not a provider.

18. If you represent or work for a college or university that supports DSA applicants, when recommending a Non-Medical Personal Helper to be hired by the student, do you check to ensure that the appointed individual has the necessary skills, experience, and clearance to support the student, prior to endorsing?



☐ Yes

☐ No

If 'yes', please tell us what type of checks you carry out

We do not intend to answer this question as we are not a provider.

19. If you represent or work for a college or university that supports DSA students, do you assist these students in undertaking their employer obligations in relation to contract, tax, NI when they employ their own Non-Medical Personal Helper?

☐ Yes

☐ No

We do not intend to answer this question as we are not a provider.

20. DSA is currently administered under three separate allowances (equipment, software and accessories / consumables / NMPH), each with different limits. In the other devolved UK nations, DSA is administered as a single allowance to be used for study support as required by the student.

In your opinion, is it helpful for students to have different allowances and limits, or do you think that a single DSA allowance limit would better support students?

Please select one:

- I would prefer allowance limits for each DSA element
- I would prefer a single DSA allowance
- Other – please specify (free text)

Can you explain why this is your preferred option?

We answer this question in part as US does not advise disabled students. We would however want to ensure that any change does not disadvantage disabled students by reducing the total amount of support available to them. There would also be a need for careful communication about any change, as it may cause anxiety if students think that the support available for some types of provision might change, or not be needs-based anymore. We would also want to ensure that there are appropriate data sharing arrangements with universities in place to allow universities to provide support .

We would also want to avoid the delays in support being available as is the situation in England.

21. If you represent or work for a college or university that supports DSA students, what is your approach when the cost to support the needs of a disabled student exceeds the relevant DSA allowance limits?

We do not intend to answer this question as we are not a provider.

22. If you represent or work for a college or university, what is your approach when the type of support required for a disabled student cannot be met through DSA allowances or when the student is not eligible for DSA?

We do not intend to answer this question as we are not a provider.

23. In most circumstances financial support for disabled students in further education is currently managed by the colleges.



Should funding for disabled students in further education continue to go to the college to support the student with their disability, or do you think this should go directly to the student (similar to DSA for HE students) to manage the additional costs?

☐ Colleges should continue to deliver all aspects of support for FE disabled students

☐ FE disabled students should be able to apply for a dedicated allowance to support with their disability/impairment needs

☐ Other

If you selected 'other', please specify.

[We do not intend to answer this question as we are not a provider.](#)

Can you please explain why this is your preferred option?

24. If you represent or work for a college or university, can you provide examples of how the different funding streams administered to your organisation by the Scottish Funding Council are used to support disabled students and students with additional learning needs?

[We do not intend to answer this question as we are not a provider.](#)

25. Are there any non-monetary improvements relating to support for disabled students, not already asked in this consultation, that you would like to comment on?

[We think that the current approach to how diagnostic evidence is provided can place additional burden on disabled applicants and we think any changes should be holistically considered from the learner's perspective.](#)

