

DISABILITY SERVICES
Consultation Feedback
21/08/2026

Contents

Disability Service – Feedback to consultation.....	2
Summary.....	2
Our Questions & areas for discussion	3
Appendix 1.....	6
Current Operating Model.....	6
Appendix 2.....	7
Disability Services Role and Core Activities	7
Appendix 3.....	10
Legislative and Policy Alignment	10
Appendix 4.....	12
Learning from the Natasha Abrahart Case.....	12
Appendix 5.....	13
Disability Service Efficiencies	13
Appendix 6.....	17
Activities We Will No Longer Be Able to Deliver Safely or Give Adequate Attention To	17
Appendix 7.....	19
Disability Services Report	19

Disability Service – Feedback to consultation

Summary

Disability Services is a specialist service that helps the University meet its legal obligations under the Equality Act 2010 while supporting disabled students to access, participate in and succeed in higher education. (See Appendix 3)

Our work extends beyond one-to-one student support. In addition to assessing disability-related needs, we coordinate support, monitor reasonable adjustments, manage complex and high-risk cases, coordinate DSA-funded support, work with NHS and external agencies, advise academic and professional services staff, support safeguarding processes, contribute to inclusive practice, and help the University manage legal and regulatory risk. With the significant increase in the proportion of disabled students attending university, Disability Services are no longer a peripheral support function and work across all areas of the university. (See Appendix 2)

Over recent years, our service has already delivered significant efficiencies. We have automated processes, introduced self-service resources, expanded workshops and group support, streamlined DSA administration, reduced in-person appointments for low stake actions, improved triage, strengthened inclusive practice, and focused adviser time on students with the greatest need. (See Appendix 5)

See Appendix 1 - Our current operating model already prioritises:

- Self-service and online information where appropriate (extensive use of digital automation e.g. Power Automate)
- Adviser-light support through workshops, drop-ins and DSA pathways.
- Intensive case management only for high-risk, complex and vulnerable students.
- Started UoD journey collaborating with service owners to embed disability inclusion in service provision.

These changes have allowed us to cope with increasing demand, but they have not created spare capacity given the recruitment freeze and non-replacement of roles resulting in reduction of 50% of advisor capacity and 60% administrative support .

Further staffing reductions will remove core functions of the service, placing the university at risk of breaching its obligations under the Equality Act 2010 and impacting student wellbeing and welfare.

(See Appendix 6) We would be less able or unable to:

- Monitor and oversee reasonable adjustments.
- Support Equality Act compliance across the institution.

- Advise academic schools and staff on embedding equality act in L&T assessment and delivery.
- Support exam adjustments and alternative assessments.
- Attend Fitness to Study, Termination and Mitigating Circumstances meetings.
- Deliver safeguarding interventions and welfare monitoring.
- Coordinate support with NHS, SAAS and other external agencies.
- Support vulnerable students through transition and periods of risk.
- Provide ongoing assistive technology and DSA-related support.
- Maintain adequate case management and service development.

The likely outcome is a shift from proactive and preventative support, which under the EqA2010 we are obligated to fulfil, to a crisis-response model, with increased waiting times, reduced support for vulnerable students, greater legal and safeguarding risks, increased pressure on academic staff, and a higher likelihood of complaints, appeals, legal challenge with an anticipated outcome of an increase in student withdrawing from courses.

The recent *Abrahart v University of Bristol* case reinforced that universities cannot simply rely on students to navigate processes successfully or engage with Disability Services before action is taken. The courts confirmed that the duty to make reasonable adjustments is proactive and anticipatory, and that universities may be liable where reasonable adjustments are not implemented. (see Appendix 4)

Our Questions & areas for discussion

Equality Act and Legal Compliance

1. Given the clear legal duties established under the Equality Act 2010 and reinforced through cases such as *Natasha Abrahart*, how does the University intend to continue meeting its obligations to disabled students if these cuts proceed? Under the EqA 2010, it is not acceptable to provide a bare minimum level of support.
2. What assessment has been undertaken of the increased legal, safeguarding and reputational risks associated with reducing disability support provision?
3. An EIA on students has been initiated, and the resulting outcome will need to be reviewed. Will this delay the timescale?
4. What assessment has been made of the impact of these proposals on the University's ability to demonstrate compliance with the UK Quality Code ([QAA](#)), particularly the expectation that students are appropriately supported to achieve their potential and that providers actively enhance the quality of the student learning experience?

Safeguarding and Duty of Care

1. What is the University's plan for maintaining its safeguarding and duty of care responsibilities if Disability and Student Services are reduced?
2. How will vulnerable students, particularly those in crisis, continue to receive timely and effective support under the proposed staffing model?

3. How do these proposals support the University's commitment to student wellbeing, independence and success?

Service Delivery and Operational Capacity

1. Given that the service is already operating at capacity, how is it expected to absorb additional demand due to reduce capacity to refer students for effective support?
2. How will the University maintain timely and effective delivery of core functions, including assessments, reasonable adjustments, exam support, DSA administration and assistive technology provision, under the proposed staffing model?
3. What evidence or workforce modelling demonstrates that the proposed staffing levels are sufficient to deliver a safe, effective and legally compliant service?

Staff Retention and Workforce Sustainability

1. How does the University intend to address the likely retention, recruitment and reputation challenges that may arise if these cuts proceed?
2. What assessment has been made of the impact on staff wellbeing, workload and burnout? The current risk assessment has 'boredom' as a risk. This seems out of touch.
3. How will service continuity be maintained if experienced staff leave as a result of the proposed changes? We are already losing another team member who is leaving because of the current uncertainty
4. How do you propose to manage the conflict between staff values, ethical practice, and deeply held moral beliefs, and the reduction or removal of services that staff consider essential for providing safe and effective student support as a result of the proposed cuts and changes?

Student Support Beyond the University

1. How does the University expect students to access appropriate external support when many external services already have limited capacity or are unavailable? NHS ND and MH services are an example
2. Have plans been made to refer students to external services?

Financial Rationale and Strategic Decision-Making

1. We are aware of the term meaningful redundancy consultation as laid out in TULRCA 1992 but we have yet to see any business case with figures and rationale for student or disability services cuts. Is this available yet and if so, can we see it?
2. Are these meetings part of the collective consultation? This is an important question, as per our communication following our last meeting, where consultation did not proceed as anticipated because the consultants did not have much awareness of how and why we function; it was more of a fact-finding exercise.
3. Disability Services has already delivered significant efficiencies. What additional efficiencies are realistically achievable without it becoming unsafe for students and staff?

4. How has the University balanced financial objectives against its legal obligations, safeguarding responsibilities and commitment to student wellbeing?

Appendix 1

Current Operating Model

Equitable Triage

Self-service

- Accessible website
- Online guides and dedicated SharePoint
 - [Disability Services Intranet - Home](#)
 - [Inclusive Practice](#)
- Adjustment request form
- Appointment opt out-opt in
- Standard adjustment as inclusive baselines
- Recorded webinars – to develop further

Adviser-light support

- Straight to DSA
- Group workshops
- Drop-in sessions
- Quick queries telephone/teams appointments

Priority case management reserved only for:

- High-risk students
- Complex disabilities
- Multiple intersecting issues
- Serious mental health concerns

This allows scarce advisers to spend most time where legal and welfare risk is greatest.

Appendix 2

Disability Services Role and Core Activities

Disability Services is a specialist-led, complex service that drives the university's inclusive education strategy and provides the expertise required to help the University fulfil its obligations under the Equality Act 2010. The team manage complex student-centred and administrative work within multiple regulatory frameworks. Their work is multi-layered, specialist, and involves significant inter-agency collaboration, including funding bodies, DSA providers, NHS and private clinicians, academic departments, professional services, former educational establishments, parents and other stakeholders. Staff interpret clinical and educational evidence, uphold legal duties under the Equality Act 2010 and monitor provision of internal and external support.

Core Activities

- ✓ Needs Assessments & Support Plans:
 - Meeting with students and conducting detailed assessments of disability-related impact on learning.
 - Undertaking dyslexia and neurodivergence screening and assessment.
 - Evaluating assessment outcomes and interpreting educational, medical and psychological evidence.
 - Making professional judgements regarding support needs, reasonable adjustments and appropriate interventions.
 - Translating complex medical/psychological evidence into practical academic adjustments.
 - Producing and updating support plans and ensuring physical and content accessibility across teaching, platforms, placements, assessments and physical access. This involves liaising with academic staff and other professional services to ensure adjustments and support are in place.
- ✓ Disabled Students' Allowance (DSA):
 - Providing information, advice and guidance on DSA eligibility (SAAS, SFE, SFW, SFNI, NHS and Research Council) for UK students.
 - Coordinating evidence-gathering and application processes.
 - Coordinating assistive technology, ergonomic equipment, and funded Non-Medical Personal Help (NMPH) support such as:
 - Specialist SpLD tutors
 - Mental health mentors
 - Study assistants
 - Communication professionals (e.g. BSL interpreters, note-takers)
- ✓ Non-Medical Help (NMPH) Coordination and Quality Assurance:
 - Contracting and onboarding internal/external NMPH staff.
 - Monitoring delivery, responding to safeguarding concerns and managing adjustments to provision.
 - Ensuring that funded support complies with provider frameworks and student needs.
- ✓ Complex Case Management and Liaison:
 - Coordinating with GPs/clinicians, CAMHS/CMHTs, psychologists, educational assessors, social work, and third sector partners.

- Managing transitions, including delayed diagnoses, crisis referrals, and evolving conditions.
 - Coordinating multi-agency support to ensure support needs are met.
 - Managing complex, high-risk and vulnerable student cases requiring coordinated intervention across multiple services.
- ✓ Training and Capacity Building:
 - Delivering student and staff training on inclusive support and anticipatory adjustments.
 - Advising on legal compliance, inclusive assessments and digital accessibility.
 - Input into curriculum design to reduce the need for retrofitted support.
- ✓ Assistive Technologies and Alternative Formats
 - Support with DSA-funded and inclusive assistive tools (e.g. text-to-speech, mind mapping, note-taking apps).
 - One-to-one and group training to build student confidence using technology for study and exams.
 - Advice on compatible tools across university systems and platforms.
 - Conversion of course materials into accessible formats (e.g. large print, audio, accessible PDFs).
 - Guidance for staff on creating inclusive content in line with accessibility regulations.
 - Collaboration with Library and IT Services to ensure access to accessible learning resources.
- ✓ Quality Assurance, Monitoring and Service Oversight
 - Monitoring the effectiveness of support and reasonable adjustments.
 - Ensuring support arrangements continue to meet student needs and funding provider requirements.
 - Providing quality assurance and oversight of disability-related support provision
- ✓ Data and Reporting:
 - Providing detailed reporting to inform governance, service improvement, and statutory returns.

Our value to the Institution

- Ensure legal compliance with the Equality Act 2010 and the University's duty to make reasonable adjustments for disabled students.
- Enable student success through reasonable adjustments, assistive technology, specialist support and inclusive practice, helping students achieve their academic potential.
- Support student retention and progression by helping disabled students overcome barriers that might otherwise lead to disengagement, interruption of studies, or withdrawal.
- Reduce risk and complaints by ensuring students receive timely support and that the University can demonstrate it has met its legal and regulatory responsibilities.
- Contribute to widening access and participation by supporting students from diverse backgrounds to enter, remain in and succeed in higher education.

- Improve student experience and satisfaction, particularly for disabled students, neurodivergent students and those with long-term health conditions.
- Support institutional priorities around equality, diversity and inclusion, helping to create a more accessible and inclusive learning environment for all students.
- Promote inclusive teaching and assessment practices, reducing barriers across the curriculum and decreasing reliance on individual adjustments over time.
- Attract and retain students, as effective disability support is an important factor in university choice and student success.
- Bring external funding into the institution through support for Disabled Students' Allowance (DSA) applications and related services.

Appendix 3

Legislative and Policy Alignment

- Equality Act 2010 (UK-wide) [Equality Act 2010 – Legislation.gov.uk](https://www.legislation.gov.uk/ukpga/2010/15/contents/enacted)

Requires higher education institutions to *anticipate* the needs of disabled students and take proactive steps to remove or reduce disadvantage (anticipatory duty).

Legal obligation to provide *reasonable adjustments* to ensure disabled students can access teaching, learning, assessment, and university life without being substantially disadvantaged.

Protects against *direct and indirect discrimination*, harassment, and victimisation.

Applies to all areas of university life, including teaching delivery, placements, digital access, accommodation and student support services.

- The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 (PSBAR) [Understanding accessibility requirements for public sector bodies - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/682222/Understanding_accessibility_requirements_for_public_sector_bodies_-_GOV.UK.pdf)

Requires universities, as public sector institutions, to ensure their digital content is accessible to all users, particularly disabled people. This includes meeting WCAG 2.1 AA standards and publishing an accessibility statement. Compliance supports legal duties under PSBAR and the Equality Act 2010, and is essential for inclusive education by ensuring students can access learning materials, services, and information without barriers.

- A Fairer Scotland for Disabled People: Progress Report and Action Plan (2021–2026)
Sets out Scotland’s long-term vision for disabled people to live with dignity, respect, and equal opportunity.

Commits public bodies, including universities, to removing structural barriers and embedding inclusive practice in policy and delivery.

Reinforces the social model of disability and promotes co-production, accessible communication, and rights-based services.

A Fairer Scotland for Disabled People: Progress Report – Scottish Government

- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
Ratified by the UK Government in 2009 and underpins both UK and Scottish policies.

Article 24 obliges states to ensure inclusive education systems at all levels and lifelong learning for disabled people.

Promotes full participation, reasonable accommodation, and accessibility in the design of educational systems.

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

- Universities Scotland – Principles for Fair Admissions
Advocates for fair and transparent admissions processes that remove barriers for disabled applicants.

Promotes contextual admissions, inclusive outreach, and support for disabled students to *not just access but succeed* in higher education.

Aligns with the Scottish Government's Widening Access agenda and targets for disabled student representation.

Principles for Fair Admissions – Universities Scotland

- Scottish Public Sector Equality Duty (PSED)

Requires universities to mainstream equality and report on progress through measurable equality outcomes.

Many universities include disability inclusion, digital accessibility, and inclusive learning in their published objectives.

PSED in Scotland – EHRC

- Quality Assurance Agency for Higher Education (QAA Scotland) [QAA Scotland – Enhancement Themes](#)

Embeds equality, diversity, and inclusion as cross-cutting themes within institutional reviews and enhancement frameworks.

Encourages student partnership and responsive curriculum design to reduce the need for retrofitted adjustments.

- British Sign Language (BSL) (Scotland) Act 2015

The Disability Team is a key stakeholder in developing and implementing the university's BSL Plan.

- Learning Disabilities, Autism and Neurodivergence (LDAN) Bill Consultation
Scottish Government 2023

Aims to strengthen the rights and inclusion of people with learning disabilities and neurodivergent people. [\[gov.scot\]](#), [\[gov.scot\]](#)

Promotes earlier identification of need and timely access to support. [\[gov.scot\]](#)

Appendix 4

Learning from the Natasha Abrahart Case

The 2022 judgment in *Natasha Abrahart v University of Bristol* profoundly impacts university obligations under the Equality Act 2010. Natasha, a 20-year-old physics student with social anxiety, died by suicide after the university failed to implement reasonable adjustments or adequately coordinate internal and external support.

Key Findings:

- The university breached its duty to make reasonable adjustments for a known mental health disability.
- A lack of joined-up internal support and failure to communicate risk were contributing factors.
- The university had ample information about Natasha's mental health, yet failed to translate this into concrete action.

Why It Matters in a Scottish Context:

- The Equality Act 2010 is UK-wide legislation and applies fully in Scotland.
- The case underscores the need for specialist-led services that are capable of:
 - Recognising legal duties.
 - Identifying, communicating, advising on reasonable adjustments.
 - Coordinating support internally and escalating concerns.
 - Coordinating with NHS and external agencies.
- It reinforces the requirement for documented procedures, early intervention, and shared responsibility across services and academic teams.

This case has directly influenced guidance from:

- Universities UK
- Equality and Human Rights Commission
- Scottish Government and Universities Scotland on mental health strategy and inclusion.

Appendix 5

Disability Service Efficiencies

Over the past 3 years, the Disability Service has worked hard to improve how we support students whilst aiming for more efficient use of staff time and resources given the swathe of cuts we have had already due to the recruitment freeze and non-replacement of roles. We have reviewed our processes at every stage of the student journey by introducing automation, reducing duplication and creating more flexible ways for students to access support.

These changes are gradually helping us respond to growing demand and ensure specialist advisor time is focused on students with the most complex needs, whilst delivering meaningful support to all of our service users.

Pre-Entry: Helping Students Prepare Before They Arrive

We have introduced several changes to make it easier for students to engage with support before they start university.

- Introduced a New to Disability Services contact form so applicants/ entrant students can tell us about their support needs before they arrive.
- This form now has an appointment opt-out and flexible alternatives to standard appointments
- Changed our confidentiality process from opt-in to opt-out, making it easier to put support in place quickly where appropriate. This has also reduced the administrative burden on advisors by removing the need for repeated follow-up with students to obtain consent, reducing delays and unnecessary back-and-forth communication.
- Automated contact with prospective students and applicants with improved information about available support and how to access it.
- Delivered transition events to help disabled students prepare for university life.
- Introduced Peer Orienteer support, helping new students learn from and connect with current students. This will reduce queries about practical procedures for entrant students.
- Developed an activity planner for disability service activities that need to be completed at certain points in an academic year, allowing planning and preparation, especially before the start of each semester.

Benefits

- Students arrive better informed and more prepared.
- Support can be planned in advance to help us meet our anticipatory duty under the Equality Act 2010
- Reducing pressure on services at the start of the academic year.

Entry and Onboarding

We have redesigned our processes so students can access support more quickly and with fewer unnecessary steps.

Automation and Streamlined Processes

- Information from the New to Disability Services form is used to begin support planning straight away.
- Features an appointment opt out with flexible contact options in keeping with universal design for learning.
- Introduced an automated Personal Emergency Evacuation Plan (PEEP) process.
- Automated the creation of support plans using information already provided by students.
- Increased the use of automated communications and standard responses for routine enquiries.
- Introduced automated appointment booking to reduce administrative workload.

Making Sure Support Matches Need

- Updated the Initial Contact Form so students can opt out of an appointment if their needs have already been met through existing support, information provided, workshops, or other interventions.
- Introduced a structured triage system so referrals are prioritised as urgent, high priority, or standard.
- Established regular drop-in sessions, allowing students to access advice quickly without needing a formal appointment.
- Created a range of support options so not every student needs a one-to-one appointment.

Direct Access to Support and Funding

- Introduced a Straight to DSA approach where appropriate, removing duplication and reducing unnecessary appointments.
- Delivered workshops on the Disabled Students' Allowance (DSA) application process.
- Developed new partnerships with Non-Medical Personal Help (NMPH) providers and improved referral processes.

Group Support and Skills Development

- Increased the use of group-based support that can help more students, especially those not eligible for or are awaiting DSA funding, at the same time.
 - o Delivered specialist study skills workshops.
 - o Expanded assistive technology workshops and training.
 - o Delivered DSA workshops and information sessions.

Improving Team Capacity

- Introduced dedicated form processing days for advisors.
- Introduced a rotating duty week system to manage enquiries, safeguarding and crisis situations and staff leave/absence more efficiently.
- Reduced appointment lengths using a standard appointment framework

Benefits

- Fewer unnecessary appointments.
- Capacity for complex cases.

- More consistent support for students.

During Study

We have focused on making support more accessible while reducing the need for unnecessary appointments and assessments.

Screening and Assessment

- Introduced automated dyslexia and neurodivergent screening processes.
- Reduced the number of appointments needed for screening.
- Reduced spending on diagnostic assessments by ensuring students are directed appropriately from the start.

Working More Closely with Academic Departments

- Strengthened links with academic schools and departments through our Disability Link Meetings
- Improved collaboration with Disability Support Officer (DSO) contacts.
- Improved communication around reasonable adjustments and student support.

Building More Inclusive Practice

- Introduced university-wide inclusive practice baselines.
- Continued to develop and strengthen inclusive approaches across teaching and learning.
- Focused on reducing barriers before students need individual adjustments.

Benefits

- Better student experience.
- Faster implementation of support.
- Reduced reliance on specialist interventions.
- More accessible learning environments for all students.

Administrative and Process Efficiencies

We have reviewed and streamlined a number of key administrative processes to reduce manual work, improve oversight and ensure students move through support processes more quickly.

- Introduced automated DSA referral forms for both internal and external referrals, reducing administration, improving consistency and speeding up access to support.
- Implemented a DSA process planner, enabling staff to track where students are within the DSA journey, improving visibility, reducing follow-up activity and helping identify delays more quickly.
- Introduced automated annual DSA reviews and renewal processes, reducing repetitive administrative tasks while ensuring students continue to receive support in a timely manner.

- Undertook a new procurement and tender process for Non-Medical Personal Help (NMPH) provision, resulting in more streamlined referral pathways, clearer processes, improved contract management and stronger financial oversight.
- Redesigned the loan equipment process, introducing greater automation and more efficient tracking systems, reducing administrative workload while improving the student experience.
- Automated a range of other routine processes including student communications, appointment confirmations, reminders, waiting list management and follow-up actions.

Benefits

- Reduced administrative burden across the service.
- Improved oversight and tracking of student support journeys.
- More efficient financial management and monitoring.
- Consistency across key processes.

Overall Impact

The Disability Service has not stood still in the face of increasing demand. We have actively reviewed and redesigned how we work to improve efficiency and make the best use of available resources.

We have:

- Moved support earlier in the student journey.
- Increased automation and reduced manual administrative work.
- Introduced drop-ins, workshops, and self-service options.
- Reduced unnecessary appointments through improved triage and student opt-out processes.
- Reduced administrative burden through streamlined consent, referral and support planning processes.
- Increased access to DSA, assistive technology and specialist support.
- Improved links with academic departments.
- Introduced more inclusive approaches across the institution.
- Focused advisor time on students with the most complex and urgent needs.
- Reduced costs through more efficient screening and assessment processes.

This efficiency work is ongoing, and aspects are still in development. However, with more cuts, we will be unable to deliver on this.

Appendix 6

Activities We Will No Longer Be Able to Deliver Safely or Give Adequate Attention To

As a result of reduced staffing and capacity, the service would be unable to maintain many of the proactive, preventative and collaborative activities that support disabled students, ensure compliance with Equality Act obligations, manage safeguarding risks, and promote student retention, progression and success.

The efficiencies that we have been working on will have to be abandoned as they will become unworkable as there are not enough advisors to cover activities.

Equality Act Compliance and Institutional Support

- Monitoring whether reasonable adjustments are being delivered
- Joint working with academic schools
- Advice to staff on disability-related issues
- Support for appeals and complaints involving disability
- Resilience response to actions that require compliance with the Equality Act 2010
- Coordination and monitoring of personal emergency evacuation plans (PEEP).

Academic Support, Adjustments and Assessments

- Alternative assessment planning
- Liaison with academic departments regarding adjustments
- Support during exam periods
- Last-minute emergency exam support
- Attendance at Fitness to Study meetings
- Attendance at misconduct meetings where disability-related factors are relevant

Safeguarding, Welfare and Risk Management

- Welfare check-ins for high-risk students
- DNA follow-up as routine
- Safeguarding interventions
- Coordination with NHS, social work and external agencies
- Consistent duty of care provision

Transition and Student Development

- Structured transition support for care-experienced and vulnerable students
- Support to develop independent study skills
- Retention-focused interventions
- Support for students considering withdrawal
- Regular contact for at-risk students
- Participation and engagement initiatives
- Coordinating adjustments in university residences

Assistive Technology and Disability-Related Resources

- Ongoing assistive technology troubleshooting and support
- Software licensing management
- Staff training on inclusive technology

- Support for students awaiting DSA-funded equipment
- Assistive technology advice for DTS
- Advice on PSBAR 2018 and WCAG for digital accessibility compliance

DSA and Funding Support

- Interim support whilst students await DSA funding
- Assistance with funding appeals
- Monitoring delayed DSA cases

Service Delivery, Capacity and Sustainability

- Adequate case management
- Appropriate caseload allocation
- Staff development and training
- Service improvement projects
- Accurate data collection and reporting
- Meaningful participation in university committees e.g. inclusive practice, AI policy
- Succession planning and service resilience

The cumulative effect of these reductions would be:

- Longer waiting times for students, if they can be seen at all, hence breach of EqA2010
- Reduced access to specialist disability support
- Reduced ability to meet Equality Act obligations
- Reduced safeguarding capacity
- Increased risk for vulnerable students
- Greater pressure on academic schools and staff who do not hold expertise
- Reduced student retention and progression
- Increased likelihood of complaints, appeals and legal challenge cf SPSO and OIA
- Increased staff burnout, sickness absence and turnover
- A shift from proactive and preventative support to crisis management only

Appendix 7

Disability Services Report

Executive Summary

The University's Disability Service supports over 4,100 students (836 students:1FTE Advisor, with the loss of a fulltime member of staff, this has increased to 1051), with demand growing year on year and student needs becoming more complex. In 2024–25, the team handled over 55,000 requests for support. Despite this, staffing has already been reduced and further cuts are proposed, including the loss of key administrative and specialist roles.

The plan proposes that Disability Advisors absorb responsibilities for funding and wellbeing activities. This will lead to unknown, but significant disabled student to advisor's advisor ratio. Advisors will have a broader responsibilities, trying to meet higher demand whilst needing more time to maintain relevant skills and sector requirements.

This creates several serious risks:

- Student wellbeing and safety: Delays in support lead to escalation of problems, particularly for mental health (MH)(AY/25/26 1,600 students managed by Disability Advisors), leading to crisis situations, and limited availability to refer on to appropriate wellbeing and counselling support.
- Access to support and funding: Students waiting longer or missing out on essential funding and practical help. Funding is a key barrier to engagement with studies and is an established MH risk factor.
- Loss of specialist support: Removing Assistive Technology and admin roles reduces the service's ability to put appropriate and timely support in place through more efficient and cost-effective provision, further increasing the demand on advisor's case load.
- Capacity problems: The service is already stretched, evidenced by waiting lists. Further cuts will increase delays and reduce the quality of support.
- Legal and reputational risk: Breach of legal duties if reasonable adjustments are not delivered effectively, leading to complaints, legal challenges, and reputational damage. It can be reasonably predicted that complaints to the Scottish Public Services Ombudsman (SPSO) are likely to increase.

The proposed changes undermine the University's Enabling Strategy (Education 2022–27), which commits to equitable access, consistent support, and timely, effective services for all students. Maintaining specialist roles and sufficient capacity remains essential to uphold legal obligations and support student safety, wellbeing, and opportunity to thrive. The proposed plan places a significant mismatch between

identified provision and the reality faced by staff delivering the service. This position is at a level where moral injury is reasonably predictable unless addressed.

Current Service Statistics

- The number of students declaring a disability is high and continues to grow (from 3699 in 2024–25 to 4,106 in 2025–26).
- Around 28% of UK students are supported by the Disability Service, reflecting a significant proportion of the student population (higher than UK average of around 20% HESA)
- Demand on the service is very high, with 55,981 support requests processed in 2024–25 (cf 44,000 handled through DTS systems).
- 2,770 Student Plans and 3,249 contacts, showing ongoing high engagement levels.
- Staffing has reduced despite rising demand, with a loss of 50% Disability Advisors frontline service capacity and 60% administrator capacity since AY 23/24 to 25/26.
- Proposed reductions include the loss of 1.0 FTE disability administrator and 1.0 FTE Assistive Technology specialist.
- Workload & complexity of operations per staff member is increasing significantly year-on-year.

The data show a clear mismatch between growing student needs and staffing capacity.

1. Introduction

The University's Disability Service supports a large and growing population of students, with 4106 students declaring a disability and around 70% actively supported. This reflects national trends across higher education. HESA data for the 2024–25 academic year shows that disabled students represent a significant and increasing proportion of the student population (+20%) with particularly high numbers in mental health conditions (increasing year on year), neurodiversity and long-term health conditions.

This growth is not only in the number of students but also in the complexity of need. Many students present with co-occurring conditions, including combinations of mental health difficulties, neurodivergence and long-term physical and sensory impairments and health conditions. These overlapping needs require careful assessment, coordinated support and sustained engagement across multiple services.

Within this context, the June 2026 recovery plan sets out to restructure Disability Services in two key ways. The first is to retain Disability Advisor roles but expand their remit to absorb additional responsibilities for funding and wellbeing support. The second is to remove specialist and operational roles, specifically the Assistive Technology Advisor and the Disability Administrative role. These changes represent a shift from a model based on specialist roles and coordinated provision to one where a reduced number of roles are expected to absorb a broader and more complex range of responsibilities while core infrastructure is reduced.

This report considers five key and interconnected risks. These are risk to student wellbeing, mental health and safeguarding, legal and compliance risk, reduced access to funding and specialist support, system capacity risk across multiple services and wider institutional risk including withdrawal, academic failure, complaints and reputational impact. The sections below map directly to these risks and show how they are already present and likely to increase under the proposed changes.

2. Risk to Wellbeing, Mental Health and Safeguarding

The most serious risks relate to student wellbeing and safety. Evidence from across higher education shows that mental health difficulties have risen 1635% since 2011 (UCAS, 2023) and are associated with poor academic outcomes, withdrawal from study and serious harm outcomes (moral, mental and physical health). These risks are increased for students with co-occurring conditions and where practical support is not in place.

AY 25/26 1730 students declared MH difficulties alone and does not factor in co-occurrence of MH difficulties and other disabilities. This figure has been rising year on year (cf AY 24/25 1600)

Disability Services play a central role in identifying need and intervening early. This includes recognising indicators of distress, maintaining ongoing engagement,

coordinating support and escalating concerns where required. Timely access allows difficulties to be identified and managed before they escalate.

Where students cannot access support in time, difficulties become more severe and harder to manage. This increases the likelihood of disengagement, deterioration in mental health and progression to crisis. It also reduces the opportunity for preventative intervention and shifts the service towards reactive crisis response rather than early support.

This is taking place in a context where external services are already stretched. Reduced capacity within the University does not reduce demand. It increases the likelihood that students will not receive support at the point at which it is needed and may have no accessible support pathway when in difficulty. In turn, this creates a direct institutional risk, with increased likelihood of crisis escalation, withdrawal and formal complaints where need is known but support cannot be accessed in time.

A further critical component of this risk will be lack of access to specialist counselling and wellbeing support. Disabled students, particularly those with co-occurring mental health needs, rely on timely access to counselling that is accessible. This type of support allows distress to be stabilised and reduces escalation into crisis.

Where this provision is reduced, delayed or absorbed into already stretched services, students are less able to access support when needed. This increases the likelihood that distress escalates before intervention takes place and increases the likelihood that risk becomes unmanaged.

Access Insights, 2025

3. Complexity of Need and Financial Vulnerability

The level of need within the student population has increased in both scale and complexity. Co-occurring conditions are now common, with students experiencing multiple interacting difficulties that affect their ability to engage with study and manage workload whilst maintaining wellbeing. These situations require coordinated and specialist input over time.

Financial vulnerability is also a significant factor. Many disabled students are not able to work alongside their studies because of their disability. This increases reliance on funding systems in the university such as discretionary funding, scholarships, and bursaries. Accessing these systems is often complex and requires clear guidance. Welfare advice frameworks such as CPAG recognise that disabled students often require specialist support to understand and secure their entitlement.

Where access to funding advice is delayed, students experience increased financial stress, delays in receiving equipment or support and difficulty maintaining engagement with their studies. If funding support is absorbed into Disability Advisor roles without

additional capacity, waiting times will increase and fewer students will be able to access support at the point of need.

This reduces access to funding at the stage it is most needed, increases financial pressure and contributes directly to disengagement and withdrawal risk, and again risk to welfare. It is also likely to exacerbate stress, anxiety and low mood amongst students.

4. Current Service Position

The Disability Service is a skilled and experienced team that has adapted its practice in response to rising demand. Staff have worked proactively and constructively to improve systems, streamline processes, prioritise higher risk cases, introduce earlier interim support through Reasonable Adjustment Plans, inclusive learning practice and maintain continuity of support across the student journey. The team is leading in the institution in using MS Power Automate and forms to automate administration in the absence of a case management system. The team relies heavily on the technology with 3 members of staff being suitably trained to ensure operations continue.

These approaches demonstrate that the service is organised, responsive and focused on practical delivery. They also demonstrate that the team has worked efficiently by employing a solution-focused strategy to manage increasing demand.

However, demand has now exceeded what can reasonably be sustained within current staffing levels. The presence of a waiting list of nearly 200 students at the end of the term reflects this position. It is not indicative of inefficiency but of a service managing a high volume of complex cases within finite resource. The team increased pre-arrival initial support plans and adjustments from 150 in AY 23/24, 250 in AY 24/25 and 430 in AY 25/26 over the summer to increase advisor capacity in Semester 1.

It is worth noting that the service simply does not have the capacity for the level of service overhaul required to bring the proposed changes forward. Past experience has shown service redesign and provision requires around on average 20% FTE commitment during planning and launch of new provisions. The current redesign of the service has come from a strong commitment from all staff, but the changes have been numerous and time consuming. New systems and processes that transform the role of Disability Advisors to include other professional support would be unsustainable given the staffing positions. It would be particularly unsustainable without a dedicated administrator.

Students on the waiting list received basic adjustments but were often unable to access wider support such as Disabled Students' Allowance, Assistive Technology and in-depth advisory support. This creates a gap between basic compliance and meaningful support in practice as committed to in the Strategic plan. More importantly, it can be deemed a breach of the Equality Act 2010.

5. Assistive Technology and Administrative Capacity Risk

Assistive Technology provision, the DSA Access Centre and administrative support represent a distinct area of risk within the proposed changes.

The University operates a national Disabled Students' Allowance Access Centre, providing both internal and external needs assessments. This service has been running successfully for around 30 years and generates income for the University.

Needs assessments are carried out by several specialist consultants. However, the effective operation of the Access Centre relies on internal roles, including the Assistive Technology Advisor and Administrative Support.

The Assistive Technology Advisor is integral to both disabled student support and the operation of the Access Centre. This role provides specialist and technical support that enables adjustments to be implemented in practice. It includes individual Assistive Technology support, study skills support, exam support and highly technical input for students with complex needs, particularly visually impaired students, deaf students and those with physical impairments.

The role also bridges the gap between recommendation and delivery. While needs assessments identify required support, the AT Advisor ensures that recommendations are translated into practical usable support for students.

Without this role, there is a clear risk that adjustments involving technology are identified but not implemented effectively, which breaches equality legislation, and has particular importance for examination and timed assessments.

The AT Advisor is also essential to the Access Centre itself. Consultants complete the assessment but the AT Advisor ensures that recommendations are actionable, supports implementation and provides continuity for students. Removing this role therefore affects both internal and external provision and will impact on its capacity for income generation.

The administrative role is also critical. It supports coordination of assessments, scheduling, communication, funding processes, DSA invoicing, NMPH invoicing and operational delivery. Without this infrastructure the system cannot function efficiently, which is an obvious expectation of the external referrers from other HEIs.

Removal of this role creates delays, reduces coordination and shifts administrative work onto Disability Advisors at the same time as they are expected to absorb additional funding and wellbeing responsibilities.

Taken together these proposals result in:

- removal of specialist AT expertise
- removal of operational administrative capacity

- additional responsibilities placed on Disability Advisors
- increased demand within the same staffing base

This is not a neutral restructuring. It is a substantial reduction in capacity combined with an increase in demand. This creates direct risk to service delivery, student support in terms of legal requirement and the sustainability of an established institutional service.

6. Capacity Risk

Disability Services do not operate in isolation. Their role is to coordinate and enable support but the effective delivery of adjustments depends on multiple services across the University. These include academic departments, timetabling services, the exam office, residences teams, estates, health and safety, counselling and, wellbeing services, amongst others across the university.

Collaboration is essential for appropriate, legally required disabled student support and adjustments. Disability Services can assess need and identify appropriate reasonable adjustments but they often rely on these wider services to implement them in practice e.g. Ensuring a person emergency evacuation plan is in place for a physically disabled student. Where these services have sufficient capacity, adjustments can be delivered effectively. If these services are overstretched adjustments may be delayed, only partially implemented or not implemented at all. In these circumstances adjustments exist in principle but not in practice. This creates a disconnect between what has been agreed, legally required and what is experienced by the student.

This is not simply an operational issue but a systemic one. The effectiveness of Disability Services is dependent on the capacity of the wider system. Where that system is under strain, the cumulative effect is that delivery slows, coordination becomes more difficult, time-consuming for advisors following up, and students experience gaps in support tantamount to discrimination for failure to make reasonable adjustment and a failure to ensure fulfilment of the anticipatory duty.

This reinforces institutional risk including increased complaints, reduced retention and the potential for regulatory scrutiny where provision is seen to be inconsistent or ineffective.

Disability Services Team has already taken considerable steps to manage demand effectively and has worked in an efficient and solution-focused way, often beyond contracted hours. The pressures now being experienced reflect the limits of capacity across the system rather than inefficiency within the service itself.

7. Legal Framework and Non-Provision of Adjustments

The Equality Act 2010 requires universities to take steps to avoid placing disabled students at a substantial disadvantage. This includes making reasonable adjustments and ensuring these are effective in practice.

A key aspect of this duty is that adjustments must not only be identified but must also be implemented. Where adjustments are delayed, only partially implemented or not delivered at all the student remains at a disadvantage. In legal terms this means the duty has not been met and discrimination occurs, particularly, failure to make reasonable adjustments and discrimination arising from disability (cf *Abrahart Case*). The obligation on institutions is not simply to have processes in place but to ensure that those processes result in effective support for students in practice.

This is particularly significant where delivery depends on multiple services. Disability Services identify need and coordinate support but implementation often depends on wider institutional systems. Where these systems are unable to deliver adjustments due to capacity constraints or operational pressures this does not remove the legal duty. The University remains responsible for ensuring that adjustments are effective.

This creates a direct legal risk. It also introduces wider institutional risk including legal challenge, financial liability, reputational damage and increased scrutiny of practice. Where there is a pattern of delay or non-delivery this risk becomes more significant.

8. The Abrahart Case

The case of *University of Bristol v Abrahart* provides important context for understanding the risks associated with non-delivery of adjustments.

Natasha Abrahart was a student with known mental health difficulties including severe social anxiety. There was clear evidence that she was unable to engage with oral assessments. Although adjustments were considered they were not implemented. She was required to complete an oral presentation assessment and died by suicide on the day it was scheduled.

The courts found that the University had failed to make reasonable adjustments and had discriminated against her under the Equality Act. The relevance of this case is not limited to exceptional circumstances. It establishes a clear principle that applies more generally. Where a student's needs are known and appropriate adjustments are identified but those adjustments are not put in place effectively the institution remains liable.

This is directly applicable in situations where delays, capacity pressures or system failures prevent adjustments from being delivered and is a genuine risk that needs to be adhered to.

9. The Enabling Strategy (Education 2022–27)

The University strategy sets out clear commitments to ensure equal access to support, consistent service standards, timely communication, effective routes into wellbeing and mental health provision, and the safety and security of all students. The proposed staffing reductions and restructuring within Disability Services place these commitments at risk.

Reduced capacity and the removal of specialist and administrative roles limit the University's ability to provide equitable and timely access to support and create inconsistency in the student experience. This also constrains timely access to appropriate wellbeing and mental health services. Maintaining student safety depends on timely identification of need and early intervention, both of which reduce as resources diminish. The expectation to deliver clear, accurate, and timely communication is also at risk, as reduced administrative capacity and increased workload limit responsive and coordinated communication with students.

Conclusion

The information presented in this report demonstrates the significant risks associated with reducing specialist student support provision. Current demand already exceeds available resource, as evidenced by rising numbers of disabled students, increasing complexity of need, and existing waiting lists. The proposed removal of specialist Assistive Technology, Student Funding, Counselling and administrative support, together with the expansion of Disability Advisor responsibilities to include funding and wellbeing functions, would reduce specialist capacity at a time when demand continues to grow.

These changes would reduce the time available for disability-related assessment, coordination and case management, whilst removing expertise and operational support that currently enables timely delivery of adjustments and wider student support. The result is a greater risk of delays, reduced opportunities for early intervention, and an increased risk to student welfare, wellbeing and safeguarding, and greater pressure on an already stretched service.

The proposals also appear inconsistent with the University's stated commitments to inclusion, student wellbeing, equal access to support and an excellent student experience. Reducing specialist provision makes these commitments more difficult to deliver in practice and risks undermining confidence in the University's capacity to meaningfully support students in need.

This creates a situation in which:

- students experience delays in accessing support
- reasonable adjustments are delayed or not implemented effectively
- mental health and safeguarding risks increase
- financial hardship and academic pressures become more difficult to address

- pressure is displaced onto NHS and community services
- legal, regulatory and reputational risks increase

The cumulative effect is likely to be reflected in student continuation, attainment and satisfaction, with wider consequences for recruitment, retention and institutional reputation. The proposed changes therefore represent not only a risk to Disability Services, but a strategic risk to the University's ability to deliver its commitments to student success, inclusion and wellbeing.