

## Response ID ANON-9W4Y-T9DC-H

Submitted to Support for part-time study and disabled students: Survey for the Higher Education and Further Education sector, training providers, third sector and interested organisations

Submitted on 2025-10-09 15:54:27

### About you

What is your name?

Name:

Lucy Evans

Are you responding as an individual or an organisation?

An organisation / institution

What is your organisation?

What is the name of your organisation?:

University of Edinburgh

University

If 'other', please specify.:

Further information about your organisation's response

Please add any additional context:

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

Publish response with name

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:

lucy.evans@ed.ac.uk

I confirm that I have read the privacy notice below and consent to the data I provide being used as set out in the privacy notice.

I consent

Where did you hear about this consultation?

Scottish Government website

If other, please say where.:

### Support for part-time and 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)?

Higher education

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

Yes

If 'other', please specify.:

To further add to our answer to Question 1, The University of Edinburgh provides a broad range of higher education provision from SCQF level 7 through to SCQF level 12. Our offering includes on-campus and online provision. Through provision hosted by our Colleges and our Centre for Open Learning (COL), we also provide a wide range of both credit-bearing and non-credit-bearing short courses.

The University of Edinburgh is also a founding member of the Scottish Widening Access Programme (SWAP), which supports adults return to education and successfully transition through a college access programme into higher education. We also host the LEAPs programme for schools.

COL offers a well-established and successful Part-time Access Programme for Adult Returners which complements the full-time SWAP programme. The COL programme is focused on widening participation and offering educational opportunities to people who have missed out in the past, often due to their health, as well as a high proportion of people with additional needs.

Our offering includes pre-Masters provision as a short course (moving from credit to non-credit/digital badge). COL exists to provide routes into, through and beyond education; part-time offers are fundamental to this.

In terms of part-time and distance learning, the majority of The University of Edinburgh's part-time provision is at postgraduate level, particularly at postgraduate taught (PGT) level. At undergraduate level, our main part-time offerings are our Childhood Practice (BA), and HCP-Med for Healthcare Professionals MBChB, a five-year course of which years 1-3 are part-time and online, with the final two being full-time and based on-campus in Edinburgh.

Additionally, the University of Edinburgh has a large portfolio of postgraduate taught online programmes. With a majority of these focused in medicine and healthcare (including veterinary courses), these programmes offer a part-time study option and flexible exit routes, allowing study to Masters, diploma or certificate level, depending on credits gained. We also offer a variety of non-credit bearing MOOCs (Massive Open Online Courses), and recently surpassed five million learners, covering every country on the planet. Our Centre for Open Learning is growing its (largely non-credit bearing) provision in lesser-taught languages, including Ukrainian and Swahili.

### 3 Do you think that support for part-time and distance learning study needs to be simplified?

Yes

Can you please explain further the reasons for this?:

We welcome the consultation and the opportunity to respond. While this has been borne from Scottish Government's stated Programme for Government commitment to ensure parity in living cost support between part-time and full-time study, clarity would be beneficial on whether the changes being considered would apply to part-time undergraduate and/or part-time postgraduate study.

In our view, there would be benefit to simplifying support for part-time and distance learning study at both undergraduate and postgraduate level. In fact, in light of changing demographics, and a challenging economic context, this simplification is now imperative.

In terms of undergraduate part-time support, we welcome Scottish Government's recognition that the personal income threshold determining eligibility for the Part-time Fee Grant (PTFG) have remained unchanged since 2013/14. These could be appropriately updated. Currently, our Access Programme fees take account of the PTFG to ensure that costs to the student are minimal. Additionally, support would be simplified and made more equitable by the Scottish Government introducing maintenance support for part-time undergraduate students.

As an institution we have found it difficult to establish an appropriate model for funding and supporting students on innovative part-time degrees. Our HealthCare Professional programme, established in partnership with the Scottish Government to meet Scottish Government priorities, was not initially eligible for fees support via SAAS; it has taken several years to arrange between Scottish Government, SAAS and SFC, and is not yet in a steady state. A simplified model would make it easier to support government priorities and students.

Whilst a very small minority of the University of Edinburgh's undergraduate provision is part-time, the current arrangements can pose difficulties for full-time students who may, for several reasons, transition to a part-time study mode (often to gain additional time to complete depending on personal circumstances).

Repeat-year students attempting to transition to part-time study can face a particular challenge that is compounded by existing SAAS support arrangements. While they may have exhausted their maximum entitlement to tuition funding, under current arrangements they can still apply for a living cost loan, if eligible, as long as the programme they are studying is a full time programme even if they are repeating part-time. Yet, part-time students are not eligible to receive any living cost support by default (if they are not eligible for tuition support), and if they need to retake 120 credits (a conventional credit amount for a full-year), are ineligible for the PTFG. Therefore, the current stipulations on the part-time study status can incentivise students to continue being enrolled as a full-time student, even if they aren't repeating the full year and if this option is unideal in light of other personal circumstances.

In general, there have been cases when an undergraduate student on a full-time course has attempted to switch to a part-time mode of study, but because they have not been eligible for undergraduate funding, they have had no choice but to continue on a full-time mode of study as they have been unable to meet their living costs. As we comment further later, we are particularly cognisant of the additional challenges our students can face as a result of high living costs, given the University's location in Scotland's capital.

Systemic issues with part-time funding also pose issues for short courses, and Access or Foundation level courses, whereby students then have no viable option other than moving onto a full-time commitment, often carrying over pressures on their time in terms of health matters, caring commitments, and work in order to be able to afford to study.

As Universities Scotland's response points out, as a mechanism, the PTFG is particularly inequitable given that full-time students benefit from having their fees paid by SAAS regardless of income – and are also able to apply for bursary and loan support. Whereas part-time students are completely unable to access these forms of Scottish Government support, simply as a consequence of their study mode.

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?

Please tell us what support your institution offers::

The University's primary means of supporting all fully-matriculated students experiencing severe financial difficulty is via a dedicated fund which can award up to £3,000 per year in cases in which need is evidenced.

This is open to all students - including part-time and distance learning students - with priority groups being students at risk of homelessness, lone parents, care leavers/care experienced students, and students estranged from their parents and guardians.

Our Centre for Open Learning has a small endowment fund which can be allocated to credit study, and we have a dedicated endowment fund which can be used to support students on the Access Programme.

5 If you represent or work for an education provider, do you think that the introduction of living cost support for part-time/distance learning study might affect your institution's course provision?

Yes

If 'yes', please tell what effect this might have.:

The introduction of living cost support for part-time and distance learning students would primarily have a positive, direct impact on the student experience of these students. Therefore, it would be unlikely to affect course provision, given that institutions would not receive it, and it would not be intended to fund provision.

However, an associated benefit its introduction may realise is students' increased ability to engage with provision. In the absence of living cost support, and in a context of rising costs, some students will have no choice but to work more hours. Improving access to living support would alleviate pressure in this respect, and also enhance engagement with existing provision.

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

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

In general, we support the mainstreaming of living support eligibility criteria between part-time and distance learning study, and full-time study. However, we support Universities Scotland's position that broadening eligibility for this living support to part-time and distance learning students should not be to the detriment of the funding currently available to full-time students.

In contrast to England and Wales, Scotland does not currently offer any living cost support to Scottish-domiciled part-time postgraduate students. While this may be based on a rationale that part-time students should have more time to take on part-time work to supplement their living costs, this stance has potential to open up inequalities. For example, without additional support, undergraduate students can find it challenging to continue directly on to postgraduate studies at the University, given the high cost of living in the capital.

Recognising the challenges in this area, the University has established the Darlington Scholarship, made possible by an alumna's legacy. The scholarship has been specifically designed for those who had Scotland domiciled fee status and benefited from an Access Edinburgh scholarship or Scotland Scholarship during their undergraduate study at the University, enabling them to directly progress to full-time postgraduate study here.

## Support for part-time and distance learning study

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?

Please give us your views::

8 The Part-Time Fee Grant (PTFG) is a grant towards tuition fees for eligible higher education students. What do you think would help to further improve support for part-time and distance learning students in higher education?

Please give us your views::

In the context of a changing economy and Scotland's ageing population, there is merit in considering the introduction of living cost support at part-time level, including at postgraduate taught level. Flexibility with regard to previous study will be key to incentivising take up. As in England, there could be scope for considering a flexible approach to previous study and shorter courses, as is due to be implemented through the Lifelong Loan Entitlement. Additionally, Scotland previously offered Individual Learning Accounts (ILAs), and we think there is merit in funding models which follow an individual's trajectory, with recognition given to the likely need for continuous upskilling and/or reskilling throughout life.

As Universities Scotland note, we would support the care-experienced bursary (and the associated flexibility of having one additional year beyond '+1' to complete) being extended to part-time students. As a consequence of their ineligibility to apply for any living cost support, part-time students are also excluded from mechanisms such as the Lone Parents' grant and the Special Support Loan. The existing "all-or-nothing" approach may overlook providing

for those in the most need of flexibility and additional support.

Similarly, PTFG eligibility thresholds not being updated also impacts on distance learning students, and revisiting these would benefit those for whom distance learning is the most suitable study option.

9 Do you feel the current eligibility criteria for the part-time fee grant work on focusing support for students who need it the most?

No

Can you explain the reasons for your answer?:

We support the PTFG in its current grant form. Aligned to Scottish Government's existing approach for full-time students, this ensures part-time students face no upfront tuition charges. Yet, as the consultation background itself acknowledges, the income threshold has remained unchanged since 2013/14.

In today's terms, £25,000 would represent a considerably lower income than it did when it was last reviewed over a decade ago. Indeed, as Universities Scotland calculates, the £25,000 salary limit is close to the most recently agreed UK minimum wage. This is exemplified by how someone working forty hours a week would exceed this threshold. This indicates that the existing threshold is outdated and that the PTFG is not accessible to students who need it most.

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?

Please give us your views::

We would highlight that institutions recognise challenges facing students studying on part-time and distance learning programmes. In fact, the University's Exceptional Circumstances policy was recently updated, enabling Schools to extend the default length of coursework extension to seven calendar days (from four days) for courses taken primarily by students on part-time programmes, or undertaking placement.

It is anticipated that this provision is likely to be used primarily by part-time programmes whose cohort is mostly mature age students who are working full-time alongside their studies. This has the potential to have a positive impact on mature age and WP students, who juggle employment commitments alongside their studies.

We have a small number of scholarships available for postgraduate online learning students, but most are focussed on students from low income countries outwith Scotland, and are tied to income from philanthropic donations.

11 Should part-time and distance learning first-degree students be included in the official data measuring progress towards the Scottish Government's target to increase the proportion of SIMD-20 learners entering higher education?

Yes

Can you explain the reasons for your answer? :

Yes - we support the inclusion of part-time and distance learning in the SIMD-20 measures and associated data.

The omission of part-time students from within the existing data overlooks a minority within the University of Edinburgh Scottish student population, especially at undergraduate level. As discussed above, this grouping is currently ineligible for means-tested bursaries and grants accessible to part-time students beyond the PTFG. Their absence from the data may mask disadvantage amongst students, and in particular, a demographic who are able to study part-time but are reticent to take out student debt to cover living costs.

Our main part-time programme, the BA Childhood Practice, has a consistently higher proportion of students from SIMD20 postcodes than the University of Edinburgh full-time average.

Including both part-time and distance learners within the data would speak to the diversity within Scotland's student population beyond full-time, first-degree undergraduates. However, as Universities Scotland points out, there are limitations to the existing SIMD-20 metrics and this may not, as a binary measure, highlight the extent of deprivation across students entering higher education in Scotland.

## Support for disabled students

12 Do you think that support for disabled students in further and/or higher education needs to be simplified?

Yes

Can you please explain further the reasons for this?:

If by 'support' you mean DSA funding, then Yes. The current DSA model is an additional bureaucratic burden on students who are more likely to have difficulties with this type of administrative task, some of whom have reduced executive function due to their disabilities.

Students can become overwhelmed by the additional bureaucracy and disengage from the process of applying for their critical DSA funded support, reducing their chances of academic success through lack of access to the support they are entitled to.

Furthermore, the complexity of applying for funded support and the spikes in number of students applying during the academic cycle can result in lengthy delays in students accessing their support. This can impact on retention of disabled students where critical support is not in place in a timely manner.

It should be emphasised that the DSA process is based on a medicalised model of disability, meaning that there is an over-reliance on formal medical diagnosis to determine eligibility. For certain conditions, the waiting lists for full diagnostic assessment are extremely lengthy - measured in years not months. As the evidence threshold is so high for DSA support some students will not receive a formal diagnosis during the time that they are studying, thereby rendering them unable to access the necessary support.

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

Please tell us what support you provide::

- Disabled Students Allowance
- University funding
- Other – occasionally grants or scholarships (e.g. Mastercard Foundation)
- The University offers a wide range of support for disabled students to include a named Student Adviser to support them throughout their studies, Disability & Learning Support Service, Student Wellbeing Service, Student Counselling Service, ResLife Wellbeing Team, Chaplaincy, The Advice Place (Students Association), Careers Service, Library Services and so on.

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

If 'yes', can you tell us what evidence you have and what examples of impact you are aware of?:

Yes, it can be for some students. Part-time is often a more viable option for students with significant chronic conditions as can be more realistically manageable. The potential impact of full-time study on disability benefits is more complex than the impact from part-time study, which understandably can worry disabled applicants and put them off full-time study. A disabled student has more to weigh up in terms of whether to study part-time or full-time, and financial support is certainly a factor.

Eligibility for DSA funded specialist support depends on whether a student is undertaking at least 50% of a full-time equivalent course. Therefore, some disabled students studying at a lower threshold are ineligible for this specialist support. We will fund such support via internal funds, but it should be noted that not all HEIs are able to do this to the equivalent level of DSA funds, creating inequity within the sector and disadvantaging disabled students.

Whether a disabled student is full-time or part-time, our non-funded institutional support is equitable across all modes of study.

15 What improvements do you feel could be made to the administration of support for disabled students in higher education?

Please give us your views::

1. Provide the funding directly to the institution. This would minimise delays for students in accessing their support. This could work in a similar way to Hardship / Discretionary Funding or Childcare Funding where funds are allocated to the institution for distribution and audited by the funding body.
2. Allow the student to apply once per course of study, rather than reapply each year. This would lead to a sharp decrease in the administrative burden for disabled students and the administrative costs for SAAS and the institution.

16 If you represent or work for an college or university, do you carry out in-house needs assessments for disabled students who are applying to access Disabled Students' Allowance (DSA) in Scotland?

Yes

If 'no', who provides needs assessments for your students?:

Yes, and we also contract out at peak times in the year.

Our Disability Advisors carry out in-house needs assessments for students studying at the University of Edinburgh. At peak periods we also refer students to the Edinburgh Access Centre to ensure students' support is not delayed due to waiting for a needs assessment.

Some of our students arrive with a needs assessment completed prior to arrival, completed by an Access Centre they have sourced themselves.

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?

2 to 4 weeks

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?

Not Answered

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

The wording is not clear on this question.

We have a pool of non-medical personal helpers on guaranteed hours contracts. These staff are hired based on experience and skills, and PVG checked.

The Service also uses contracted NMPH's through third party suppliers who do the necessary employment checks for their own staff.

For cases where the student hires their own NMPH, we would not be involved in endorsing them.

## Support for disabled students

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?

No

20 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?

I would prefer a single DSA allowance

If 'other', please specify.:

It makes more sense to have a single allowance, which can be used to meet individual needs.

It doesn't make practical sense to have a separate equipment budget if the student doesn't need equipment but does need a high- level of practical support (Non-Medical Personal Help). There is an additional administrative burden to make exceptional requests to transfer funds to meet student needs, which again can delay critical support. Generally, when requests are made to SAAS, funds can be transferred between allowances, which indicates that there is not necessarily a barrier to merging all available allowances into one pot. This approach would better meet the needs of the increasingly complex disabled students we are seeing in Higher Education.

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?

Please give us your views.:

We will make a special request to SAAS for additional funding. If this is unsuccessful then the University will cover the excess via internal funds. Both the increasing numbers and individual complexities of disabled students is increasing the number of students whose support needs exceed the DSA allowance, putting increased pressure on internal University funds. There will be HEIs that are unable to match this level of financial support.

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?

Please give us your views.:

If a student does not qualify for DSA but requires funded specialist support, we will conduct an internal version of a needs assessment and provide the required support via internal University funds. This could be providing in-house NMH support, purchasing or loaning software/equipment, providing a printing allowance or funding transport, as required by the individual.

Our approach ensures the provision of specialised support to all disabled students regardless of eligibility for DSA. Given our high proportion of overseas students, we have many students who are not eligible for DSA due to residency who are then supported via internal university funds.

23 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

If 'other', please specify.:

Can you explain why this is your preferred option?:

Based on the experience in Higher Education, financial support for disabled students in Further Education should continue to be managed directly by the colleges. As above, reducing administrative burden, delays and costs for both SAAS and the institution.

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?

Please provide examples here::

We use discretionary funds from the Scottish Government to support disability diagnosis costs. For 2024-25, this was £9,137 for 70 students.

However, funding we receive from unrestricted sources contributes to our overall budget, which we then distribute internally. Our annual Planning Round and budgeting process allows us to reflect on our activities and deliverables, together with our internal and external operating context. These form the basis for our planned activities and budgets for the next year. When we allocate funding it is up to individual departments to decide on the best use of total unrestricted funding to deliver against their plans.

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?

Please give us your views::

That the 13 recommendations from the Review of Disability Related Student Support (2021) published by SAAS are progressed. To date progress on any of these recommendations has been disappointingly slow despite the Review making a strong set of sensible recommendations.

## Evaluation

How satisfied were you with this consultation?

Not Answered

Please enter comments here.:

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Slightly satisfied

Please enter comments here.:

It would be helpful to indicate whether questions are free text or closed at the outset (including in the question summary) so this information is evident to respondents when they are preparing their response, ahead of populating answers in the set platform template.