

## STUDENT SUPPORT INFORMATION NOTE (SSIN)

### ARRANGEMENTS FOR STUDENTS FUNDED UNDER THE STUDENT SUPPORT REGULATIONS DISABLED STUDENTS' ALLOWANCES (DSAs)

SSIN XX/17  
July 2017

**To:** Student Finance administrators and practitioners in institutions of higher education, further education or specialist colleges providing HE, and alternative providers;

DSA assessors, assessment centres and suppliers;

The Disabled Students' Allowance Quality Assurance Group;

Student Finance advisors, and

The Student Loans Company

Dear Colleagues,

#### **Additional Guidance on managing Conflicts of Interest in Disabled Students' Allowances (DSAs)**

##### Background

1. The Department for Education has recently been reviewing the content of the conflict of interest statements that have been supplied to DSA-QAG. We are concerned a number do not provide the information necessary to give the department assurance that conflicts are being identified and managed.
2. We are therefore providing further guidance in this letter which should be read in conjunction with the previous guidance on managing conflicts of interest in SSIN 10/16 which is available at <http://www.practitioners.slc.co.uk/media/1156/201617-conflict-of-interest-non-medical-help-suppliers.pdf>
3. You should note we will be undertaking a review of the next iteration of statements that Assessment Centres, Non-Medical Help (NMH) suppliers and Assistive Technology Service Providers (ATSP) are required to provide to DSA-QAG in December each year. Upon review, statements which do not provide the information necessary to provide assurance, will result in individual DSAs providers being suspended from the DSA-QAG register until we are assured that any conflicts have been identified and managed satisfactorily.

##### What are conflict of interest statements for?

4. The Department for Education is required to ensure that public funds are used fairly, transparently, and for the purpose intended. Conflict of interest statements are used to provide assurance that conflicts of interest form part of the usual risk assessments that any organisation undertakes, and where a conflict is identified it is managed in an appropriate and timely manner.

What should a conflict of interest statement contain?

5. The statement should state clearly the process an organisation goes through to identify any potential conflicts of interest, and how often it does so. It should contain details of the declaration all staff must be asked to sign (i.e. not just assessors), and copies of these must be appended to the statement if staff have identified an individual conflict. All staff in an organisation should sign the same conflict of interest statement, and managers must take responsibility for ensuring staff understand their obligations in identifying conflicts. All staff declarations must be signed, and must also be countersigned by a manager or other responsible person, and original signed statements should be available for DSA-QAG audit purposes.

6. Purely as an example, a statement might say something like the following about the process for identifying personal conflicts:

“Each year we ask all staff to sign a declaration of interest. The process we follow is that line managers interview each member of their team to ensure they understand the process. Managers also ensure staff understand they must identify any relationships (financial or personal) they have with any other parts of the organisation, or with other DSAs providers, that might raise questions of impropriety in the allocation of DSAs. We then ask the members of staff to sign and date the declaration, which is at the same time countersigned and dated by the interviewing manager. This same process is followed when any new member of staff is taken on, and will be repeated for all staff if there were any change to the ownership of the organisation. All original signed declarations are stored securely for further reference”.

7. The statement must also contain details of how any identified personal conflicts are managed, and should contain details of how the organisation would manage any conflicts identified in the future. The way conflicts are managed must be specific to the conflict identified and show how the conflict is not allowed to influence DSAs. So a statement on managing a specific personal conflict might say something like the following:

“Our assessor Josephine Smith has identified that her partner Joe Smith works for XYZ who are providers of NMH support via DSAs. To prevent any conflict of interest we have separated Josephine’s role in assessing students for DSA from her role in providing quotations. When Josephine assesses a student and identifies on the Needs Assessment Report that they require NMH support, she passes the completed NAR to me as manager. I identify two suitable quotes for NMH and dispatch the NAR to SFE. Josephine has no contact with the NARs containing NMH recommendations after the interview stage. By separating Josephine’s roles in this way we have

identified and managed the conflict of interest in an appropriate way. I attach Josephine's declaration of interest as required."

Any processes for identifying *organisational* conflicts and managing them should be described in the same way as in the 2 examples above.

#### What should the statement not do?

8. The statement should not:

- Contain a general statement of the organisation's policies, except where this specifically impacts on declarations of interest
- Explain the organisation's policy with regard to assessing students
- Explain the organisation's policy in recruiting assessors
- Concentrate on a relationship with one supplier at the expense of similar supplier relationships
- Explain the organisation's quality assurance procedure
- In most circumstances be no longer than 2 or 3 sides of A4 paper

#### How often should the declarations be signed?

9. The declarations should be signed annually, and should be revisited when any organisational or relevant change takes place. When this occurs, new declarations must be forwarded to DSA-QAG.

10. DSA-QAG will open up the online register on 1 December each year for completion by all organisations by 31 December of the same year. Failure to submit a completed declaration will result in temporary suspension from the DSA-QAG register and website.