

Response ID ANON-6AQH-RP5Z-1

Submitted to Assistive software funded through Disabled Students' Allowance
Submitted on 2026-06-16 09:36:31

Introduction

Introductory questions

1 What is your name? [Optional - leave blank if you wish to submit an anonymous response]

Name:
Dr Emma Maslin

2 What is your email address? [Optional - leave blank if you wish to submit an anonymous response]

Email address:
e.maslin@amoshe.org.uk

3 Are you responding as an individual or on behalf of an organisation?

Organisation

Other (please specify):

4 If you are responding on behalf of an organisation, what is the name of your organisation? [Optional - leave blank if you wish to submit an anonymous response]

Name of organisation:
AMOSSHE, The Student Services Organisation

5 What category do you fall into? [Select all categories that apply]

Other (please specify)

Other (please specify):

Professional association for Student Services professionals.

6 Would you be happy for us to contact you about your response?

Yes

Background

Principles

Artificial intelligence (AI)

7 Are the AI features that have been incorporated into DSA-funded assistive software products compliant with HEPs' policies on AI?

Please comment below::

We have no comments for this section.

8 How should we take into account HEPs' policies on AI in our decisions on what to fund through DSA?

Please comment below::

- The UK Government Department for Education should recognise that higher education provider policies on artificial intelligence (AI), and the subsequent recommendations for how AI is used by students, differ across the sector.
- We recommend that DSA Needs Assessors receive training to ensure they're able to appropriately recommend software and training that comply with provider policies on AI use.
- One member told us that a Needs Assessor recommended Grammarly Premium to a student when it did not meet the requirements of their provider's AI policy. This recommendation was unhelpful, and confused the student about what software they could use to support with grammar and spelling.
- We acknowledge that the Department for Education has already removed non-specialist spelling and grammar software from DSA funding. However, it remains a useful example of where a needs assessment didn't sufficiently match provider policy on AI-enhanced software.
- The Department for Education should regularly review its approach to decisions on which AI-enhanced software it funds through DSA. Regular

assessments would ensure cost changes and application updates to AI software would be accounted for in future funding decisions.

9 Should DSA fund software products containing generative AI tools that can create original content for students' academic work?

Please comment below::

We have no comments for this section.

10 Are there any ethical concerns regarding the use of AI in assistive software products? Does this pose any risk to students?

Please comment below::

We have no comments for this section.

11 In what ways can AI be used to improve support for disabled students?

Please comment below::

We have no comments for this section.

12 In what way do AI tools designed for general use differ from those integrated into assistive software for students with disabilities, and how do any differences affect user experience, accessibility, and so on?

Please comment below::

We have no comments for this section.

Application of DSA principles

Spelling and grammar software

Assistive technology training and aftercare support

Computers and associated equipment

Proposals

Demanding software

13 Do you have any comments on our proposal to fund demanding software only where there is no suitable non-demanding software available that meets the student's needs?

Please comment below::

- Distinguishing between 'demanding' and 'non-demanding' software will negatively impact disabled students' experiences of higher education.
- In the rationale for the intended approach for funding demanding software, it states that the decision was reached in a bid to manage public funding more effectively. However, the proposal does not outline the savings the proposal would create.
- As well, the proposals' equality impact assessment fails to consider how the proposals may impact students who currently receive DSA funding for 'demanding software', but would be ineligible under the new proposals.
- For example, neurodivergent students who historically may have been recommended text-to-speech software would be ineligible to access the technology under the new proposal.
- Consequently, students with specific disabilities are at risk of not receiving the same level of support as their disabled peers under the proposed approach.
- It is likely providers will need to assist students with other streams of institutional funding, such as hardship funds or student bursaries. However, recent research from Universities UK (2026) has found that institutions are increasingly reducing these types of funding sources due to financial challenges in the sector.
- As a result, the proposed change is at risk of creating an unequal university experience for specific disabled student groups when compared to other disabled students, as well as non-disabled peers. For example, without additional funding, disabled students from low socioeconomic backgrounds are more at risk, as they are susceptible to digital poverty and are more likely to be unable to afford a personal computer.
- To fill the gap in DSA-funded provision, university resources will be put under additional pressure to provide students with the equipment necessary to support their learning.

Universities UK. (2026). Two in five universities consider joining forces through 'multi academy trust' style models or mergers, new survey shows.

Retrieved 4 June 2026, from

<https://www.universitiesuk.ac.uk/what-we-do/creating-voice-our-members/media-releases/two-five-universities-consider-joining>

14 Do you have any comments on the definition of "demanding software" for DSA purposes?

Please comment below::

We have no comments for this section.

Composition and mind mapping software

15 Do you have any comments on our proposed approach to composition and mind mapping software?

Please comment below::

- We agree that for some students, freely available software for composition and mind mapping purposes will be sufficient for their needs.
- However, there will be instances where the basic, free software does not offer features that would help with composition or mind-mapping. For example, the composition software Gemini has a usage limit for the free version of its product.
- Some free versions of mind-mapping software require all mind maps to be made publicly available, resulting in potential issues around GDPR compliance for an institution. Students may be reluctant to use the product if they are unable to make their mind maps private.
- Free composition and mind mapping software may also have adverts, which can be disruptive to students' learning.
- The current proposals do not sufficiently recognise that the availability of certain functions within free software may change over time. Free composition and mind-mapping software may currently contain the necessary components that students require, but it might change over time.
- Changes have already happened with users of the mind mapping software Xmind. Previously, institutional licenses meant that all institutional users were able to use the software. However, now the software limits institutional licenses to an upper map limit, with any additional maps requiring a separate user license.
- We recommend that the Department for Education continually reviews the functionality of free composition and mind-mapping software to ensure students are not negatively impacted by any future changes to the functionality and policies of this type of software.
- We recognise that the proposed approach to this type of software states that students may be able to access paid-for software in exceptional circumstances. What constitutes exceptional circumstances has not yet been established, which means we are unable to comprehensively comment on the impact of the proposal on disabled students.
- We strongly advise that the Department for Education conducts further consultation with sector organisations like ours, AMOSSHE The Student Services Organisation, so that it can fully understand the implications of its proposals on students and disability services teams.
- The Department for Education should also provide free training for assistive technology trainers and/or disability support staff on free and paid-for assistive technology software. Training would ensure university staff can support students in taking full advantage of the software recommended to them by their DSA needs assessment.

Note-taking, recording and captioning software

16 Do you have any comments on our proposed approach to note-taking, recording and captioning software?

Please comment below::

- The proposal suggests that captioning software should only be funded in exceptional circumstances, which rests on the premise that this type of software is already available for students.
- In-person and online seminars are less likely to be recorded, which means they are less likely to have captioning options available. Also, the accuracy of automated captions is variable for seminars hosted on Microsoft Teams, Blackboard Collaborate and Zoom.
- Free captioning and note-taking software may have advert pop-ups which can be disruptive and add additional barriers to students' learning.
- The current proposals outlined in this consultation do not sufficiently recognise that the availability of certain functions within free software may change over time. Free captioning and note-taking software may currently contain the necessary components that students require, but this may change.
- Consequently, we recommend that the Department for Education continually reviews the functionalities and policies of free captioning and note-taking software to ensure students are not negatively impacted by future changes.
- We recognise that the proposed approach to this type of software states that students may be able to access paid-for software in exceptional circumstances. What constitutes exceptional circumstances has not yet been established, which means we are unable to comprehensively comment on the impact of the proposal on disabled students.
- We strongly advise that the Department for Education conducts further consultation with sector organisations like ours, AMOSSHE The Student Services Organisation, so that it can fully understand the implications of its proposals on students and disability services teams.
- The Department for Education should also provide free training for assistive technology trainers and/or disability support staff on free and paid-for assistive technology software. Training would ensure university staff can support students in taking full advantage of the software recommended to them by their DSA needs assessment.

Optical Character Recognition (OCR) software

17 Do you have any comments on our proposed approach to OCR software?

Please comment below::

We have no comments for this section.

Presentation support software

18 Do you have any comments on our proposed approach to presentation support software?

Please comment below::

- The proposed approach states that all students would benefit from presentation support software. While we agree that presentation support software can benefit all students, this type of software offers additional benefits for students with specific disabilities.
- Presentation support software provides cognitive and emotional building blocks for students to help scaffold their approach to oral presentations. It also has recording capabilities for university assessments. The feature is useful for students with a working memory deficit and/or with anxiety, who may require an oral presentation to be pre-recorded as a reasonable adjustment.
- Only funding the software in exceptional circumstances risks minimising a student's lived experience of their disability. Also, it does not reduce the potential barriers to learning that disabled students can face in higher education.
- In the *Abrahart v University of Bristol* [2024] case, the UK High Court upheld the judgement that the university had breached the Equality Act 2010 by not providing sufficient reasonable adjustments to a student with social anxiety disorder for an assessment by oral presentation.
- Removing funding for presentation support software reduces an institution's capabilities to meet its legal duties.
- The current proposals do not sufficiently recognise that the availability of certain functions within free software may change over time. Free presentation support software may currently contain the necessary components that students require, but this might change.
- Consequently, we recommend that the Department for Education continually reviews the functionality and policies of free presentation support software to ensure students are not negatively impacted by any future changes to the software.
- We recognise that the proposed approach to this type of software states that students may be able to access paid-for software in exceptional circumstances. What constitutes exceptional circumstances has not yet been established, which means we are unable to comprehensively comment on the impact of the proposal on disabled students.
- We strongly advise that the Department for Education conducts further consultation with sector organisations like ours, AMOSSHE The Student Services Organisation, so that it can fully understand the implications of its proposals on students and disability services teams.
- The Department for Education should also provide free training for assistive technology trainers and/or disability support staff on free and paid-for assistive technology software. Training would ensure university staff can support students in taking full advantage of the software recommended to them by their DSA needs assessment.

Research and referencing software

19 Do you have any comments on our proposed approach to research and referencing software?

Please comment below::

We have no comments for this section.

Revision software

20 Do you have any comments on our proposed approach to revision software?

Please comment below::

- The proposed approach states that all students would benefit from revision software. While we agree that revision software can benefit all students, this type of software offers additional benefits for students with specific disabilities.
- For example, students with ADHD (attention deficit hyperactivity disorder) and/or dyslexia benefit from time management and learning gamification tools.
- Only funding this software in exceptional circumstances risks minimising a student's lived experience of their disability. Also, potentially increasing the learning barriers for disabled students in higher education.
- The current proposals do not sufficiently recognise that the availability of certain functions within free software may change over time. Free revision software may currently contain the necessary components students require, but this might change.
- Consequently, we recommend that the Department for Education regularly reviews the functionality and policies of free revision software to ensure students are not negatively impacted by any future changes to the software. We recognise that the proposed approach to this type of software states that students may be able to access paid-for software in exceptional circumstances. What constitutes exceptional circumstances has not yet been established, which means we are unable to comprehensively comment on the impact of the proposal on disabled students.
- We strongly advise that the Department for Education conducts further consultation with sector organisations like ours, AMOSSHE The Student Services Organisation, so that it can fully understand the implications of its proposals on students and disability services teams.
- The Department for Education should also provide free training for assistive technology trainers and/or disability support staff on free and paid-for assistive technology software. Training would ensure university staff can support students in taking full advantage of the software recommended to them by their DSA needs assessment.

Software to support vision impairment

21 Do you have any comments on our proposed approach to software to support vision impairment?

Please comment below::

We have no comments for this section.

Speech-to-text software

22 Do you have any comments on our proposed approach to speech-to-text software?

Please comment below::

- It would be helpful if the Disabled Students' Allowance aligned with the software students use in their previous schooling. Applications like Dragon are used in secondary schools and colleges, and aligning software recommendations with commonly used software would positively support disabled students' transition into higher education.
- The proposed changes to software funding state that specific software types will only be funded in exceptional circumstances because free versions would be sufficient for students. This includes speech-to-text software for certain categories of students, although this software will continue to be funded for students who rely on speech recognition as their primary method of written communication and to control a computer.
- However, the parameters placed around who can access paid-for speech-to-text software ignore where free-to-access speech-to-text tools are unable to sufficiently interact with the different software a disabled student may use to aid their studies.
- For example, a student may wish to use a speech-to-text tool during an exam. It is common practice for assistive technology software to be required to be downloaded on an exam laptop to comply with assessment guidelines. However, free-to-access versions of this software are often only available via an internet browser, with only the paid version being available for download.
- At the time of their DSA needs assessment, students are unlikely to know what software they would like to use in an end-of-year exam, so this is unlikely to be accounted for at the time of the assessment. This means that the decision to fund speech-to-text software for students who do not rely on speech recognition as their primary method of written communication cannot be sufficiently reviewed on a case-by-case basis, as suggested in the proposals.

Text-to-speech software

23 Do you have any comments on our proposed approach to text-to-speech software?

Please comment below::

- For text-to-speech software, it would be helpful if the Disabled Students' Allowance Needs Assessors recommended software students have used in their previous schooling. Applications like Texthelp are already used in secondary schools and colleges, and aligning software recommendations to commonly used software would aid disabled students' transition into higher education.
- The changes to software funding state that particular software types will only be funded in exceptional circumstances because free versions would be sufficient for students.
- The exceptions include text-to-speech software for certain categories of students, although this software will continue to be funded for students with a vision impairment.
- However, the decision ignores that free-to-access text-to-speech tools are often unable to work with the different software a disabled student may be using to aid their studies.
- For example, a student may wish to use a text-to-speech tool during an exam. It is common practice for assistive technology software to be required to be downloaded on an exam laptop to comply with assessment guidelines. However, free-to-access versions of this software are often only available via an internet browser, with only the paid version being available for download.
- At the time of their DSA needs assessment, students are unlikely to know what software they would like to use in an end-of-year exam, so this is unlikely to be accounted for at the time of the assessment. This means that the decision to fund text-to-speech software for students who do not have a visual impairment cannot be sufficiently reviewed on a case-by-case basis, as suggested in the proposals.

Time and task management software

24 Do you have any comments on our proposed approach to time and task management software?

Please comment below::

- The current proposals do not sufficiently recognise that the availability of certain functions within free software may change over time. Free time and task management software may currently feature the tools required for students, but this might change.
- Consequently, we recommend that the Department for Education continually reviews the functionality of free time and task management software to ensure that students are not negatively impacted by any future changes to functionalities or policies of this type of software.
- We recognise that the proposed approach to this type of software states that students may be able to access paid-for software in exceptional circumstances. What constitutes exceptional circumstances has not yet been established, which means we are unable to comprehensively comment on the impact of the proposal on disabled students.
- We strongly advise that the Department for Education conducts further consultation with sector organisations like ours, AMOSSHE The Student Services Organisation, so that it can fully understand the implications of its proposals on students and disability services teams.
- The Department for Education should also provide free training for assistive technology trainers and/or disability support staff on free and paid-for assistive technology software. Training would ensure university staff can support students in taking full advantage of the software recommended to them by their DSA needs assessment.

Training software

25 Do you have any comments on our proposed approach to training software?

Please comment below::

- We welcome the proposal for no changes to be made to the funding for training software. However, we believe this type of software will be less frequently recommended by DSA Needs Assessors as the proposals suggest reducing DSA-funded assistive technology software for students.
- Not all higher education providers employ assistive technology trainers to support their student body. Where universities fund assistive technology staff, it may only be one or two full-time staff positions.
- Should the proposed changes listed in this consultation progress, assistive technology staff will need regular training to ensure their knowledge is up to date with the functions of both free and paid-for assistive technology software.
- Such training should be provided by the Department for Education at no additional cost to providers.

Typing tutor software

26 Do you have any comments on our proposed approach to typing tutor software?

Please comment below::

We have no comments for this section.

Exceptional circumstances

27 What types of exceptional circumstances do you think should be considered when deciding whether to make exceptions to the proposals set out above?

Please comment below::

- Any decision-making on what constitutes exceptional circumstances should acknowledge the complex and contextually dependent nature of disabled students' needs.
- Introducing a means testing mechanism within the exceptional circumstances process would help ensure students from lower income backgrounds are not disproportionately disadvantaged, which is further outlined in our response to question 29.
- It would be helpful for needs assessments to be reviewed in cases in which a student made a genuine attempt to use the free software for assistive technology products that are no longer funded. In such cases, access to DSA-funded alternatives may be necessary to ensure equitable participation.

Software pricing

28 What are your thoughts on our proposal to fund the lowest cost software product available that meets the needs of the student?

Please comment below::

- We believe that a cost based approach to assistive technology funding risks prioritising affordability over the effectiveness of assistive technology software. The approach is unlikely to fulfil disabled students' needs and risks having an adverse impact on the access, independence and academic outcomes of disabled students.
- Low-cost software is rarely the most functional or of the best quality for students. As such, mandating that DSA needs assessments should only fund the cheapest software available will negatively impact a student's ability to fully engage with their studies.
- Disabled students may feel that they need to pay out of their own money for an upgraded license or alternative software product to access the most suitable software for their needs. We believe it could lead to an inequitable experience for disabled students as it will be dictated by a student's socioeconomic status.
- Without additional funding, the proposed approach will negatively impact higher education providers. A few providers have reported that their disability premium funding is based on the number of students receiving the Disabled Students' Allowance. If fewer students receive DSA, it will reduce the funding universities receive to support their disabled student community.
- As budgets for Disability teams are often set every couple of years, the proposed changes to DSA-funded assistive technology will not have been factored in advance. As a result, Disability services will be faced with an unforeseen reduction in funding combined with greater student need.
- As well, the shortfall in funding is likely to result in an increase in applications to student hardship funding bursaries. Universities are already reporting cuts to student hardship funding bursaries (UUK, 2026), and therefore this proposal will put further financial pressure on providers.
- The current proposals do not sufficiently recognise that the costs, functionalities, and policies of software may change over time. Higher education providers are already seeing an increase in costs for software, and many of the changes push free or budget version users to purchase the premium software.
- Should the proposals proceed, we recommend that the Department for Education continually review the costs, functionality, and policies of assistive technology software to ensure students are not negatively impacted by changes.
- The Department for Education should also provide free training for assistive technology trainers and/or disability support staff on free and paid-for assistive technology software. Training would ensure university staff can support students in taking full advantage of the software recommended to them by their DSA needs assessment.
- Assistive technology is well evidenced to improve the engagement, participation and outcomes for disabled students, particularly by enabling independent access to study. Proposals that rely on free software as an equivalent to premium software, without robust evidence which demonstrates equal provision offered, risk undermining the benefits where individual needs are not fully met. This may ultimately represent a backward step in inclusive provision.

Universities UK. (2026). Two in five universities consider joining forces through 'multi academy trust' style models or mergers, new survey shows. Retrieved 4 June 2026, from <https://www.universitiesuk.ac.uk/what-we-do/creating-voice-our-members/media-releases/two-five-universities-consider-joining>

Equality Impact Assessment

29 What do you think are the equality impacts of our proposals?

Please comment below::

- Per The Equality Act 2010, disability is a protected characteristic, protecting individuals with disabilities from discrimination in the workplace and wider society. Higher education providers are public sector bodies that are governed by the Equality Act 2010. As such, they must ensure disabled students receive equal opportunity to their non-disabled peers to succeed in their studies.

- As well, the proposals do not take into consideration the upcoming Office for Students' (2026) statement of expectations for English higher education providers on their provision for disabled students.
- Research suggests that disabled students often have a poorer experience of higher education than their non-disabled peers (Office for Students, 2025).
- Our members recognise the importance of addressing the gaps in ensuring equal opportunity for disabled students. We feel that the proposals set out in this consultation will hinder higher education providers in responding to these governmental and regulatory requirements to ensure disabled students can succeed in their studies.
- The process of applying for DSA, whereby students must complete multiple forms, obtain medical evidence and undergo an assessment, is often documented as stressful (Disabled Students UK, 2026). The application process can already lead to variable support offered to students, depending on the needs assessor and the timing of the assessment process.
- Despite their eligibility, the administrative burden of applying for DSA already prevents some disabled students from applying for funding.
- If disabled students are set to be offered mostly free versions of assistive technology software, with limited functionality and training available, they may not see the benefit of applying for the allowance. It could be the reality for students with dyslexia, ADHD, autism and mental health conditions to receive a reduction in support under these current proposals.
- In some cases, the proposals outlined in this consultation may prohibit disabled students from entering higher education entirely if they feel they will be unable to get the support needed for them to succeed in their studies.
- This consultation proposes that free versions of assistive technology software will be recommended to disabled students unless there are exceptional circumstances that rule that they are unfit for purpose. However, some software licenses only provide free access when installed on a university computer. This means that disabled students could be expected to travel to campus to use software recommended to them by a DSA-needs assessment.
- Due to their additional requirements, students with a disability already have higher expenses in attending university in comparison to their non-disabled peers (Scope, 2026). Additional costs include, but are not limited to, specific accommodation, transport and energy needs. These proposals will add further financial burden onto disabled students who already face a greater expense in their travel to campus than their non-disabled peers.
- The proposals risk creating an inequitable university experience for disabled students from lower socioeconomic backgrounds, which is not accounted for in the proposals' equality impact assessment. As highlighted in question 28, students may feel they need to pay out of their own money to access the most suitable assistive technology to support their studies. Disabled students from lower socioeconomic backgrounds will be unable to afford the additional expense. And, if they choose to take on the expense, it could limit their ability to participate in non-scholarly activities that would enhance their student experience.
- We feel that these proposals risk disabled students receiving assistive technology software based on the software the Department of Education are willing to fund, rather than a student's assessed needs. The proposals do not clearly explain how they would reduce costs, and how the changes would not cause greater harm for disabled students.

Disabled Students UK. (2026). 2025 Access Insights Report. Retrieved June 8, 2026, from <https://disabledstudents.co.uk/2025-access-insights-report-3/>

Office for Students. (2025). One size doesn't fit all: Equality of opportunity for disabled students. Retrieved June 4, 2026, from <https://www.officeforstudents.org.uk/publications/one-size-doesn-t-fit-all-equality-of-opportunity-for-disabled-students/>

Office for Students. (2026). Announcing the development of a statement of expectations in relation to disability. Retrieved June 4, 2026, from <https://www.officeforstudents.org.uk/news-blog-and-events/blog/announcing-the-development-of-a-statement-of-expectations-in-relation-to-disability/>

Scope. (2026). Budgeting for university as a disabled student. Retrieved June 8, 2026, from <https://www.scope.org.uk/advice-and-support/managing-costs-disabled-student>

Appendix 1 - Software List

Appendix 2 – Demanding Software

Appendix 3 – Protected characteristics of DSA recipients