

Jean Arnold
Interim Director for Quality and Access
Office for Students
Bristol
BS34 8SR



Dear Jean,

We're writing to provide feedback on the current proposals for the statement of expectations on disability.

AMOSSHE, The Student Services Organisation, represents the collective voice of Student Services leaders across the UK. Our members are uniquely positioned in holding strategic oversight of student experience in UK universities, whilst implementing student support that responds to the evolving sector landscape and diverse student needs. AMOSSHE supports the need for providers to be accountable and consistent in their approach to student disability support. We have provided suggestions below to ensure that any requirements placed on providers are realistic for the sector to deliver. Our feedback has been formulated through discussions with members and our Executive Committee. Our suggestions fall into three main areas: resourcing, clarity of expectations and case studies of practice.

Resourcing

An impactful approach to supporting students with a disability requires adequate funding to appropriately address the requirements. We strongly recommend that the regulator provides a clear timeline for when the statement will come into force to give providers sufficient time to appropriately implement its expectations.

The statement of expectations may require providers to undertake significant additional work across the institution, at a time when obtaining sufficient resourcing to maintain existing service provision for disabled students is already challenging. We therefore welcome the regulator's proposals for senior leadership accountability in supporting the needs of disabled students, which include ensuring sufficient resourcing.

Sufficient resourcing also means that suitable capacity and expertise are allocated across a provider. Academic staff and professional services outside of student services teams all have an important part in supporting disabled students. Adopting a whole-institution approach to improving disabled students' experiences of higher education, underpinned by senior leadership support, would ultimately improve the effectiveness of the statement.

Clarity of expectations

We understand that as a principles-based regulator, the Office for Students (OfS) will not mandate a singular approach to the statement of expectations. We support any requirements on institutions that are sufficiently flexible to enable providers to adopt an approach that suits their specific context. However, further

clarity on a few of the key themes proposed would enable student services professionals to confidently make the changes needed.

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We'd recommend further information about how the statement relates to existing legal and sector regulation, including how it will apply within particular contexts like collaborative partnerships and transnational education. We'd also recommend that any staff training requirements should clearly state who should be trained and the level of knowledge that staff members are expected to know in line with their role. Staff training should be informed by both students and disability services staff to ensure meaningful practice.

Examples of good practice

We understand that the proposed statement of expectations will establish a set of minimum standards for the sector. It would be helpful for the wider sector for an accompanying Insight briefing or equivalent to feature case studies of best practice in supporting disabled students in higher education. Our members value learning from emerging and successful practice in this area to inform their own services. While some higher education providers have used charter awards to further their practice, this is unlikely to be the right approach for the whole sector. Therefore, the provision of case studies that highlight good practice through a variety of approaches would likely elevate sector practice in a way that will positively impact disabled students.

Future steps

AMOSSHE welcomes the continued commitment from the OfS to work in partnership with the sector. We've appreciated opportunities to verbally raise our recommendations for the statement, through our continued relationship with OfS staff leading this work, and our representation on the Disability in Higher Education advisory panel. Our delegates immensely valued the Office for Students' workshop on the statement at our 2026 National Conference for the opportunity it provided to query and shape the proposals. We are united with the regulator that the proposed statement becomes a useful tool for providers to improve disabled students' experiences of higher education. We feel our suggestions would support this aim by ensuring it is rooted in the current realities of sector practice.

As many of our members oversee disability service provision, we're happy to continue to be involved in any future opportunities to engage constructively with the upcoming statement. Please do not hesitate to get in touch if you have any questions about the issues raised in this letter.

Kind regards,

John Bloomfield



Executive Director, AMOSSHE