INDEPENDENT HIGHER EDUCATION

IHE response to the DfE consultation on assistive software funded through Disabled Students' Allowance

June 2026

Introduction

Our response highlights that any policy or funding decisions must recognise how quickly technology is changing. Software that appears compliant or freely available at one point can change rapidly through updates, new features or revised pricing models. We therefore urge a cautious approach, with clearer national principles, better visibility of AI functionality within assistive software, regular review, and mechanisms for providers to challenge assumptions where tools are not appropriate in their teaching or assessment contexts.

We caution that the proposals rely too heavily on the premise that assistive software is already "readily available" through free, built-in or provider-supplied tools. Availability in principle does not mean usability in practice, and assumes homogenisation of the contexts that students learn in.

We also highlight the risk that, rather than simplifying support, the proposed changes could shift additional burden onto disabled students. Under the model outlined, students may continue to be recommended multiple tools, but increasingly expected to find, combine and manage them independently across different sources. This creates the potential for increased cognitive and administrative load, particularly for neurodivergent students, mature learners, students on short or intensive courses, and those studying in specialist or practice-based settings.

We also stress that the diversity of the higher education sector must be central to any future model. Provider size, subject specialism, delivery model, IT infrastructure and access to specialist resource all affect whether provider-level or mainstream tools can genuinely replace individual DSA-funded support. Over-reliance on exceptions as a way to fill these gaps risks

creating inconsistent outcomes and placing further self-advocacy demands on disabled students.

A key theme emerging from the feedback we received from IHE Members is that training remains the most powerful lever for improving outcomes. Non-use of assistive technology often reflects a lack of ongoing, embedded and contextualised training - not a lack of need.

We recommend that DSA reform should focus on improving implementation, building staff confidence and strengthening student support, underpinned by a more coordinated, sector-wide approach to assistive technology training.

Artificial Intelligence

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

Our response to the consultation's questions on Artificial Intelligence reflects feedback from IHE Members, including disability practitioners, learning technologists and quality compliance staff, alongside insights from the IHE Student Advisory Board's research: Student use of AI in higher education. Across these areas, members and students emphasised that the key to safe and effective reform lies not in restricting technology per se, but in clarity of purpose, consistency of framing, and protection against unintended burden on students.

AI policy uncertainty reflects a fast-moving technology landscape, not a lack of action by providers

Staff noted that compatibility is difficult to determine consistently because institutional AI policies are at different stages of development and interpretation. Members stressed that this is an emerging area which is changing so quickly that policy frameworks can become out of date almost as soon as they are written. The difficulty providers face in determining whether products are compliant therefore reflects the pace of technological change and the need to understand its implications for teaching and assessment.

Software can move out of alignment with policy faster than providers can reassess it

There is a risk that software initially assessed as acceptable may later introduce new AI-enabled functionality through updates, without reassessment or visibility for providers or needs assessors. This creates a gap between initial compliance decisions and ongoing compliance, particularly where AI features are embedded incrementally rather than clearly signposted.

Free and readily available tools are often the fastest-moving and least controllable part of the market

The tools most often described as "free" or "readily available" are also the ones over which providers and policymakers have the least control. For instance, AI features are being added rapidly and unevenly across free and paid versions of products, meaning that what appears available and compliant at one point may change quickly. Building a funding model around what is currently free or readily available therefore risks becoming out of date almost immediately.

Availability and pricing can change faster than policy can respond

Members highlighted that products can move quickly between free, tiered and paid models, with different AI features offered at each level. This means that creating a stable funding model on the basis of what is freely available is inherently fragile. A tool that appears to provide a workable free option during consultation may no longer do so by the time policy is implemented.

Shared understanding of what products actually do is still inconsistent

Staff also highlighted that assessors, providers, and academic teams do not always share a common understanding of what AI functionality is contained within specific software products, increasing the risk of misalignment between DSA-funded tools and institutional expectations.

Students face uneven and shifting rules in practice

Students reported that policy implementation is experienced unevenly in practice, with different interpretations between modules and staff. This will pose a problem for students to know whether AI features within commonly used tools are considered acceptable, even when the software itself had been recommended through formal support routes.

The solution is clearer visibility, regular review, and a way to challenge assumptions

Any reform in this area would benefit from mechanisms that ensure AI functionality within DSA-funded software is clearly documented, visible to assessors and providers, and subject to periodic reassessment as features evolve. Given the pace of change, there should also be scope for regular review and a route for providers to challenge assumptions about compliance where the nature of what they teach makes certain AI functionality inappropriate in practice.

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

DSA decisions should not lean too heavily on local AI policies while the field is still evolving

IHE Members cautioned against DSA funding decisions relying heavily on provider AI policies as a proxy for suitability, given the current variability in policy maturity and clarity.

Members also noted that policy development is having to keep pace with rapid technological change, meaning DSA decisions based on current policies risk becoming outdated quickly. They emphasised that funding decisions should focus on the *function* of AI features - particularly whether they support access, organisation, or comprehension - rather than their technical presence. National-level guidance was seen as necessary to avoid inconsistent outcomes driven by provider differences.

Clear national principles would reduce uncertainty for students and support consistent DSA decisions

Students expressed concern that provider policies without clear, consistent framing can increase uncertainty and anxiety, particularly where policies are unclear or applied inconsistently across modules or staff. Where this happens, students reported fear of accidental non-compliance, even when using AI in good faith for assistive purposes. From this feedback, IHE suggests that clearer national-level principles on acceptable AI functionality for assistive

purposes would provide more stability than trying to track every local policy shift, helping DSA funding decisions remain consistent while local institutional policies continue to evolve.

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

A blanket ban on generative AI would remove some genuinely assistive tools

IHE Members did not support a blanket exclusion of assistive software containing generative AI. Instead, they stressed the importance of distinguishing between AI that supports accessibility (e.g. planning, structuring, summarising, language clarification) and AI that generates assessed content. They warned that excluding software on the basis of generative capability alone risks removing tools that meaningfully support disabled students, without clear evidence that this improves academic integrity.

Restricting tools now risks hard-coding a response to a rapidly changing transition period

Staff also noted that concerns about generative AI are increasingly being addressed through assessment design rather than tool restriction. They emphasised that many providers are actively reviewing and adapting assessment approaches, but that these changes take time to implement. Introducing funding restrictions while the sector is still in transition was therefore seen as premature and potentially detrimental.

Students distinguish clearly between support for thinking and replacing thinking

From a student perspective, there was a consistent distinction between using AI to support thinking and using AI to replace thinking. Neurodivergent students described AI-enabled tools as supporting organisation, reducing cognitive load, and enabling sustained engagement. Students also raised concerns about fairness, noting that access to paid AI tools may confer advantage, meaning that blanket withdrawal of funded tools could exacerbate inequality rather than reduce risk.

Withdrawing funded access may deepen inequality rather than level the playing field

These concerns are reinforced by external evidence from the Ada Lovelace Institute, which highlights the risk that reliance on generic or optional AI tools can create a two-tier system, where those with greater confidence, skills, or financial resources benefit most. Applied to assistive support, this suggests that withdrawing funded provision may advantage some students while disadvantaging others, rather than levelling access.

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

Ethical risk arises when assistive tools cross into doing academic work for students

Staff identified several ethical risks associated with AI-enabled assistive software, particularly where AI functionality extends beyond supporting access and begins to perform academic work on a student's behalf. This was seen as creating a risk of inadvertent academic

misconduct, especially where tools rewrite, synthesise, or generate academic content within software that is otherwise presented to students as "assistive".

Data protection uncertainty creates ethical and legal risk for students

A significant ethical concern raised by staff relates to data protection and GDPR compliance. IHE Members highlighted uncertainty about how student data is processed, stored, and reused within AI-enabled software, particularly where data may be transferred outside the UK or EU, or used to train models without clear transparency. Students may be encouraged or required to use tools without being able to make an informed judgement about data protection risks, placing them at potential legal and ethical risk through no fault of their own.

Uneven institutional approaches create fairness risks

Quality and academic standards staff further noted that inconsistent institutional approaches to AI increase ethical risk. Where expectations are unclear or unevenly applied, students may face different consequences for similar behaviour, raising concerns about fairness, proportionality, and due process.

For students, uncertainty itself is an ethical harm

Students' ethical concerns focused primarily on uncertainty and unintended harm, rather than deliberate misuse. Many described anxiety about unknowingly breaching academic rules due to unclear boundaries around AI use, particularly where guidance varies between modules or staff. This uncertainty was experienced as an ethical issue in itself, creating stress and undermining trust.

Fairness concerns grow when paid tools offer advantages and assistive use is misread

Fairness and equity were also raised as ethical concerns. Students noted that access to more advanced or paid AI tools may advantage some learners over others, while neurodivergent students expressed concern that genuinely assistive use of AI could be misinterpreted as misconduct if ethical distinctions are not clearly articulated.

AI-enabled assistive software is not inherently unethical - poor boundaries are the problem

Across student feedback, there was little support for framing AI-enabled assistive software as inherently unethical. Instead, students consistently argued that ethical risk arises when boundaries are poorly defined, or responsibility for navigating complex rules is placed solely on the student.

Clear information and shared expectations would reduce ethical risk significantly

Ethical risk would be reduced where students are given clear, consistent information about how AI-enabled assistive software functions, how their data is used, and where the boundaries of acceptable academic use may sit. The first step towards this is establishing a national approach, before any funding changes.

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

AI can improve support when it reduces cognitive load without replacing judgement

Staff recognised clear potential benefits where AI is used to support planning, organisation, comprehension, and navigation of complex material. These uses were seen as aligned with the

purpose of assistive technology, particularly when accompanied by clear boundaries and guidance. Staff noted that AI can reduce unnecessary cognitive load without replacing academic judgement.

Students value AI most when it helps them structure work and sustain engagement

Students described AI as helping them avoid research "rabbit holes", break tasks into manageable steps, maintain routines, and clarify understanding. Neurodivergent students reported that these functions enabled them to demonstrate learning more effectively, rather than substituting for learning.

These benefits depend on structured support, not informal uptake

These benefits are most likely to be realised for DSA recipients where AI use is explicitly framed as assistive, supported by guidance, and integrated into existing support and assessment practices rather than left to informal or uneven adoption. Structured support also requires consistent training for staff who support students, so that AI-enabled tools are understood and used effectively in context. While a move towards free or readily available tools may reduce software costs in some cases, those savings are likely to need reinvestment in training and support if the tools are to be genuinely useful for disabled students.

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 and accessibility?

The key difference is structured assurance, not simply whether AI is present

DSA-funded assistive software carries an implicit assurance that the tool is appropriate to the student's needs, compatible with study requirements, and supported by training or guidance. This differs from general-use AI tools, where responsibility for judging suitability, risk, and compliance sits largely with the student. Removing or restricting assistive provision while assuming equivalent use of general tools is therefore shifting responsibility and risk back onto students.

General-use tools create more decision-making burden and less confidence

Assistive software provided through needs assessment and DSA funding ensures that students do not have to independently identify, evaluate, or pay for tools themselves. This is particularly important for disabled students, for whom the burden of researching, selecting, and funding appropriate tools can itself be a barrier to access.

General-use tools may be available to all, but students will differ significantly in their ability to identify appropriate tools, understand their limitations, and use them safely and effectively. Without structured support, those with the greatest confidence, digital skills, time, or existing knowledge are likely to get the most out of such tools, which risks exacerbating inequalities rather than widening access.

Students consistently described valuing tools and approaches that reduce cognitive load, limit unnecessary decision-making, and provide confidence that they are working within acceptable boundaries. Their concerns focused less on the specific type of tool used, and more on clarity, fairness, and confidence that they were receiving appropriate support without risking academic

misconduct. This reinforces the case for collaborative national models of use and consistent staff training: general tools may have a role, but staff training becomes the linchpin in ensuring that any model based on them does not deepen existing inequalities.

Policy should account for who carries the risk when AI tools are used

Taken together, the evidence suggests that the key distinction is not the presence of AI functionality itself, but the context of access and assurance. AI-enabled assistive software is accessed through structured support mechanisms that remove financial, technical, and decision-making barriers and provide confidence in suitability. This difference should be taken into account in DSA policy considerations, which should include national frameworks, consistent use modelling, and training for staff.

Proposals

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?

Value for money must not override real-world suitability

IHE Members recognise the need to ensure value for money within DSA but emphasised that effectiveness and accessibility are critical components of value. Members were concerned that the proposed funding approach relies on the existing definition of "non-demanding" software, which does not adequately reflect course context or real-world use. As set out in response to Q14, software that is technically non-demanding in isolation may be unsuitable in practice once integrated workflows are taken into account.

Generic alternatives may not work in discipline-specific environments

Members highlighted the risk that non-demanding alternatives may be judged "suitable" despite failing to integrate effectively with discipline-specific tools or provider-used platforms. This was seen as particularly problematic in creative, specialist, and technical provision, where generic tools may not function reliably within required software environments.

The proposals over-assume Microsoft-based environments

Members further noted that the proposals appear to over-assume Microsoft-based environments, which do not reflect the diversity of platforms used across the sector. Members use Microsoft, Apple and Google-based systems; built-in tools may be available or effective on one platform but unavailable, inferior, or incompatible on others.

Members emphasised that platform choice is often driven by industry needs as much as academic considerations, e.g. Apple is commonly used in contexts with a strong focus on creative software, while Google platforms are often preferred for online collaborative teaching and assessment creation. It is therefore not appropriate to assume that a Microsoft-based system will be suitable or accessible in all cases.

Suitability must be judged in context, not in principle alone

Overall, members stressed that suitability cannot be determined solely by whether a non-demanding alternative exists in principle. Funding decisions must take account of platform

compatibility, and students' established workflows and familiarity, otherwise there is a risk that cost-driven substitution undermines accessibility rather than supporting it.

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

Integrated study environments create cumulative demand

IHE Members highlighted that in many creative, design, technical, and vocational disciplines, students work within complex, integrated software ecosystems, where assistive software must operate alongside specialist subject-specific tools, large files, or real-time processing applications. In these contexts, cumulative system demands are significant, even where individual components may not appear demanding when assessed independently.

Definitions should reflect educational reality, not standalone thresholds

As a result, members cautioned that the current definition fails to capture the practical educational reality of many students' study environments. They emphasised that a meaningful definition of "demanding software" should consider interaction with required course software, platform complexity, and cumulative workload, rather than relying solely on standalone technical thresholds.

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

The assumption that assistive software is "readily available" is too weak a basis for funding reform

IHE Members raised overarching concerns about the assumptions within the consultation that assistive software is generally "readily available". These points apply across the multiple software categories under consultation and are also particularly relevant to composition and mind-mapping tools, which are often treated as optional or generally useful rather than as essential support for some disabled students. Due to the nature of the consultation, our response to this question will be duplicated elsewhere, where relevant.

Members do not have confidence that "free" means equivalent or reliably accessible

When asked whether most assistive software needed by disabled students is readily available free of charge, the majority of members indicated that this assumption is not accurate at all, or only somewhat accurate. Members also reported low confidence that students would be able to access equivalent support if DSA-funded software were withdrawn. This calls into question the basis on which routine funding for composition and mind-mapping software is proposed to be reduced.

Availability in theory does not mean usability in practice

Members described concrete situations where software may be theoretically available but not usable in practice, including:

- providers being unable to offer site-wide licences due to institutional IT structures (for example, NHS-linked organisations)

- students lacking *.ac.uk* email addresses, preventing access to "free" Microsoft-based tools
- restrictions that allow software to be installed only on institutional devices and not on students' personal equipment
- situations where providers must purchase individual licences per student, creating inconsistency and additional administrative burden.

Reduced funding is likely to shift costs and burden elsewhere

When asked how institutions would need to respond if DSA funding were reduced, members indicated that costs would need to be absorbed institutionally, support levels would be reduced, or reliance on case-by-case exceptions would increase, with associated administrative and cognitive burden for students.

Current sector evidence does not support the assumption that provider-level substitution is sufficient

Evidence from the 2025 Office of the Independent Adjudicator Annual Report further indicates that inclusive practice is not yet sufficiently embedded to prevent higher volumes of complaints from disabled students, particularly where staff are uncertain about complex adjustments or flexibility within academic standards. This evidence suggests a need for caution about assuming that provider-level provision can routinely replace individual DSA-funded support in this area.

Reducing funded tools does not automatically reduce overwhelm

Members also challenged the consultation's framing of student "overwhelm". While the proposals suggest that funding fewer assistive tools will reduce overwhelm, the consultation also makes clear that needs assessors will continue to recommend software based on need, with changes focused on what DSA funds rather than on reducing recommendations overall. Taken together, this implies that students may still be recommended the same number of tools, but will increasingly be expected to self-source, combine, or navigate access to free or provider-supplied alternatives.

The problem is not the tools themselves, but how students are expected to navigate them

Members did not identify assistive technology itself as the cause of overwhelm. Instead, they described overwhelm arising where:

- students, particularly mature or postgraduate learners, are given long lists of unfamiliar software
- courses are short or intensive, leaving insufficient time to embed multiple tools
- students disengage because they cannot determine which tools are essential versus optional.

Fragmented sourcing is likely to increase, not reduce, burden on students

Several members explicitly noted that if students continue to be recommended multiple tools but are required to locate and access them via different sources, the overall burden on students is likely to increase rather than decrease.

For some students, composition and mind-mapping tools are essential, not optional
In relation specifically to composition and mind-mapping software, members emphasised that while these tools are widely used, they may be essential rather than optional for some disabled students, including those with dyslexia or ADHD. Members raised concerns that free mind-mapping tools, where available, are often inferior to specialist software in terms of functionality, usability, or suitability for complex tasks. The proposals were seen as blurring the distinction between tools that are "helpful for all" and those that are necessary for some, with a resulting over-reliance on exceptional circumstances.

Continuity and familiarity are part of accessibility. Members also noted that continuity and familiarity are central to effective use of composition and mind-mapping software, and that disrupting established workflows can increase cognitive load and reduce uptake. Members cautioned that increased reliance on exceptions risks greater administrative burden and heightened self-advocacy demands on disabled students, undermining the intended aim of simplification.

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

Provider-level provision is developing at different speeds across the sector and may not yet provide a consistent basis for replacing routine individual support
IHE Members raised concerns about the assumption within the proposals that note-taking, recording and captioning can be treated primarily as a provider responsibility, with reduced need for individual DSA-funded support. While many providers are working towards more inclusive practice, members emphasised that current provision is uneven in both availability and quality, and varies significantly depending on provider capacity, subject area, and delivery model.

Access would become more contingent on where and what a student studies
Members cautioned that removing routine DSA funding in this area risks uneven access for students, depending on where and what they study. Provider-level captioning and recording systems may be available in some contexts, but not consistently across all courses, platforms, or teaching formats. For example, in courses with high levels of industry engagement or practice-based delivery, there may be fewer traditional lectures that can be easily recorded and captioned, with greater reliance on workshops, placements, or smaller group teaching, where content is less easily captured and note-taking is more challenging. Even where systems exist, reliability, accuracy, and suitability for individual needs can vary. Members noted that the accuracy and suitability of automated captioning can vary significantly, particularly in specialist or technical subjects, limiting its effectiveness as a substitute for individual support.

The proposed approach risks creating fragmented support arrangements
Members also highlighted that the proposed approach risks increasing complexity rather than reducing it. In practice, students may be required to combine provider-supplied systems, free or built-in tools, and remaining DSA-funded support. This creates fragmented support arrangements that students must navigate independently.

Institutional contexts vary significantly across the sector, which may limit the effectiveness of a uniform approach

Members noted that a diverse higher education sector includes providers with different sizes, specialisms, and delivery models, many of which are highly effective at supporting particular student groups. However, reliance on provider-level systems risks uneven access for students, given the diversity of provider size and models. Capacity to implement and maintain high-quality captioning and recording solutions varies according to institutional context, meaning that without routine DSA provision, access to effective support may become contingent on institutional resources rather than individual need.

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

Member evidence supports caution about blanket assumptions of availability and equivalence

The wider evidence in this consultation suggests that assumptions about software being free, built-in, or readily available should not be treated as sufficient evidence that it is accessible, equivalent, or appropriate in practice.

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

Presentation support should not be treated as optional where it enables students to demonstrate learning effectively

The wider consultation evidence suggests caution about narrowing support on the basis that tools are generally available. For some disabled students, presentation support is not an enhancement but an access requirement, particularly where structuring, rehearsal, confidence, or multimodal communication are barriers to demonstrating learning. Any revised approach should therefore preserve flexibility where software plays a material role in enabling fair participation.

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

Research and referencing tools cannot be judged on availability alone

Tools in this area may appear widely available, yet still differ significantly in usability, integration, training support, and compatibility with institutional or subject-specific workflows. Where such software reduces cognitive load and supports accurate academic practice for disabled students, policy should avoid assuming that generic or freely available alternatives are necessarily equivalent in practice.

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

Revision software may be a core access tool for some students, not a discretionary extra
Evidence from IHE Members and students indicates that software supporting memory, structure, repetition, and task management can be central to reducing cognitive load and enabling effective study for some disabled students. Any move away from routine provision should therefore proceed cautiously and should not assume that free or generic alternatives offer the same level of support, continuity, or accessibility. This reinforces the need for a coordinated national approach, including clear standards and a structured training model, to ensure that revision tools are used consistently and effectively across the sector.

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

Software for vision impairment should remain clearly within routine funded provision
IHE Members support the continued routine funding of software to support vision impairment, with no reduction in scope. Such software is clearly disability-specific and essential for access, and members did not identify evidence that would justify a change to the current approach.

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

A rigid "primary method" test risks excluding students whose needs fluctuate
IHE Members broadly agreed that advanced speech-to-text software is most critical where speech is the primary method of written communication. However, they cautioned that determining what constitutes a "primary method" may be contentious and variable over time, as students' needs can fluctuate depending on workload, health, or assessment type. For instance, when moving between placement and study, needs may change significantly. Rigid application of this criterion risks excluding students whose reliance on speech-to-text is episodic but nonetheless essential.

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

There is no clear evidence that free or built-in text-to-speech tools are universally sufficient
There was no clear member consensus that free or built-in text-to-speech tools are consistently sufficient, nor was there confidence expressed that routine withdrawal of DSA-funded provision would be without impact. Text-to-speech arose within wider concerns about assumptions of availability, platform variability, and the role of training in making tools usable in practice. As such, member evidence does not support a blanket assumption that text-to-speech software is universally accessible or adequate, and any policy change in this area should proceed cautiously and be informed by further evidence.

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

Time and task management tools are often part of access, not just productivity

IHE Members noted that time and task management software often sits at the intersection of disability support, organisation, and wellbeing, and cannot be neatly categorised as either generic productivity tools or non-essential support. For some disabled students, particularly those with neurodivergent conditions, these tools play a critical role in enabling engagement with study rather than simply enhancing efficiency.

Students use these tools to reduce overwhelm by creating structure

Student discussion highlighted that time and task management tools help reduce overwhelm by supporting planning, prioritisation, and task breakdown. Students described difficulties from having to manage complexity, make decisions, and organise work without sufficient structure.

Reducing routine funding would shift complexity rather than remove it

This therefore raises concern that reducing routine DSA funding in this area risks shifting complexity rather than reducing it. In practice, students may continue to be advised to use organisational tools but be required to navigate a mixture of free tools, provider-supplied systems, and limited funded support. Members emphasised that this places additional cognitive and administrative burden on students, particularly where they are expected to self-select, integrate, and maintain multiple systems without clear prioritisation or guidance.

Removing routine provision risks undermining engagement for the students who rely on these tools most

Overall, members cautioned that treating time and task management software as out of scope risks underestimating its role in supporting access to learning. Removing routine provision may undermine engagement for some students and exacerbate the very challenges the proposals seek to address.

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

Training is a core access enabler, not an optional add-on

IHE Members expressed strong support for the continued funding of assistive technology training and emphasised that training is a critical enabler of effective access, not an optional add-on. However, evidence from members consistently indicates that one-off training is insufficient and that lack of ongoing, contextualised support is a major contributor to non-use of assistive software.

Software is not truly accessible if students are left to teach themselves how to use it

Members described frequent situations where software exists, but students do not know how to use it effectively. Training was often characterised as being delivered too early, as a single session, or disconnected from real academic tasks and assessment contexts. This was particularly problematic where students were later expected to apply tools independently during periods of high workload. Members also noted that open-source or free tools frequently come

with little or no guidance, leaving students to self-teach complex workflows, which places significant cognitive burden on disabled students.

Where training is strong, uptake and impact improve significantly

By contrast, members gave clear examples where high-quality, ongoing assistive technology training transformed student engagement, enabling students to embed tools into their study practices and use them confidently over time. Where training was poor or absent, non-use was not seen as evidence that tools were unnecessary, but that they were inaccessible in practice.

A more co-ordinated sector-wide training model would improve consistency and value

Members highlighted the importance of extending training to provider staff and embedding training within course and assessment contexts, to ensure assistive technologies are understood and supported across the learning environment. IHE urges the DSA to consider the value in a more co-ordinated, sector-level approach to assistive technology training, rather than reliance on fragmented local provision. Sector-wide models should be explored, for example through sector organisations such as Jisc. This would offer opportunities to improve consistency, quality, and efficiency, while reducing duplication of effort.

Improving support and implementation is more likely to deliver value than restricting software access

Overall, IHE members indicated that expanding training and ongoing support would be more likely to improve student outcomes than reducing access to assistive software, suggesting that non-use is primarily a support and implementation issue rather than a provisioning issue. A coordinated approach to training was seen as central to achieving value for money while maintaining accessibility.

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

Typing tutor software may often be low priority, but flexibility is still needed

IHE Members broadly agreed that free or built-in typing tutor tools may be sufficient in many cases. However, it should be noted that this assumes students can identify, access, and use appropriate tools independently, and that flexibility should be retained where required.

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

Exceptional circumstances must be a safety net, not the main route to support

IHE Members cautioned strongly against over-reliance on exceptional circumstances as a routine safeguard. Complex, case-by-case systems risk inconsistency, increased cognitive and administrative burden on students, and uneven outcomes depending on confidence and ability to self-advocate. Members emphasised that exceptional circumstances should operate as a genuine safety net, not as a substitute for clear, predictable entitlement to support.

Exceptions will be needed wherever assumptions about availability or equivalence break down in practice

Members identified a range of circumstances where an exceptions-based approach would need to be applied to avoid disadvantaging disabled students as a result of proposed changes to DSA funding. These circumstances arise where assumptions about availability or equivalence of support do not hold in practice:

1. Where tools are technically available but not usable in practice
   Members described situations where free or provider-supplied tools exist in principle, but are not usable in practice due to limited functionality, or insufficient training and support. Examples included software that cannot be installed on students' personal devices, tools that are available only on specific platforms, or provision that relies on students independently navigating complex systems. In disciplines that rely on specialist, vocational, or technical software, generic tools may not integrate effectively with required platforms, assessment workflows, or file formats. Members stressed that availability alone does not guarantee accessibility, that support must align with how study actually takes place, and that such cases should be recognised as exceptional circumstances.

2. Transitions during study
   Members also highlighted the need for flexibility where students' circumstances change during study. Students may transition between devices, platforms, courses, institutions, or modes of delivery. This includes placement settings, where assumptions of availability may not apply in the same way. In such cases, tools that were previously "available" may no longer be accessible or appropriate. Members emphasised that the system must be able to adapt as students' lives and study environments adapt, rather than assuming static need over time.

3. Provider capacity and context
   Members noted that provider capacity should be taken into account, particularly in small, specialist, or non-traditional institutions. Differences in IT infrastructure, licensing arrangements, and staff capacity mean that the range of assistive software that can be offered institutionally varies by context. Members stressed the realities of a provider with a very small student body which are different from those of a large university, even where there is a strong commitment to inclusive practice. Exceptional circumstances are therefore required to prevent students' access to support becoming contingent on institutional context rather than individual need.

Fast-moving AI features strengthen the case for review and challenge

Members also emphasised that exceptions and review mechanisms will become more important as AI functionality continues to evolve rapidly across software products. Because free and mainstream tools can change faster than institutional or national policy, any model based on current assumptions of availability or compliance will need regular review and a workable route for providers to challenge decisions where the software landscape or teaching context has materially shifted.

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

Lowest cost is not the same as best value

IHE Members expressed concern that a lowest-cost funding approach risks conflating price with value. Evidence from practice suggests that familiarity, continuity, and integration are critical components of accessibility, and that replacing established tools purely on the basis of cost can undermine effective support. IHE Member polling indicated that a lowest-cost funding approach is likely to shift costs onto institutions or result in reduced support, rather than delivering efficiency savings.

Lower upfront cost may create wider system costs

Evidence from the OIA suggests that inconsistent or poorly embedded support increases the risk of complaints from disabled students, calling into question whether lower-cost provision represents genuine value when wider system impacts are considered.

Cheaper tools can create false economies if they disrupt effective support

Members highlighted several risks associated with a lowest-cost model, including disruption where students are required to move away from tools they already know and trust, increased cognitive load and retraining demands, and false economies where cheaper tools are poorly adopted or go unused. In these circumstances, savings achieved at the point of procurement may be offset by reduced effectiveness, increased support needs, or disengagement.

A lowest-cost rule risks shifting burden onto students and providers

There was additional concern that a lowest-cost approach could shift burden and risk onto students and providers. Students may be expected to adapt to unfamiliar tools, while providers may need to absorb additional training or support costs to compensate. This raises questions about whether a lowest-cost rule represents genuine value for money when assessed against accessibility outcomes rather than short-term savings.

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

The proposals risk creating a two-tier system of support, with access contingent on individual student circumstance

IHE Members raised concerns that the proposals risk creating a two-tier system of support for disabled students. This concern was articulated most clearly in relation to differential treatment between disability groups, where some forms of impairment retain routine access to funded support while others are increasingly directed towards exceptions-based or self-sourced provision. Members warned that this risks embedding structural inequality, with access to effective support becoming contingent on a student's ability to navigate complex systems, advocate for themselves, or absorb additional costs.

There was particular concern that students with neurological and cognitive impairments, mature learners, and those studying at providers with more limited institutional capacity may be disproportionately affected. Members emphasised that such an outcome would not reflect

differences in need, but differences in system navigation, confidence, and provider context, and would therefore undermine equality of opportunity.

Students at lower-tariff and non-traditional providers may be disproportionately affected

Research into non-medical help funded through DSA suggests that students at lower-tariff providers are more likely to report meaningful benefit from support. This indicates that removing or restricting routine DSA provision may have disproportionate impacts on students at institutions serving higher proportions of non-traditional or under-represented learners.

Mature learners may face disproportionate cognitive and administrative burden

Members highlighted that mature students may be disproportionately affected by reduced routine provision and increased reliance on exceptions. Many mature learners arrive with established professional workflows and limited time to adapt to multiple unfamiliar tools, particularly on short or intensive courses. Members noted that balancing study alongside work, caring responsibilities, or placements reduces the capacity to experiment with or embed new software through trial and error. Increased reliance on self-selection, choice, and navigating multiple systems was described as adding significant cognitive and administrative burden. This was seen as particularly challenging for students returning to education after a long gap.

Members also observed that many mature students are diagnosed with neurodivergent conditions later in life and may have limited experience of formal disability support systems. In these cases, greater reliance on self-advocacy and system navigation risks disengagement rather than effective access to support.

Sector-wide assumptions may disadvantage providers serving high numbers of non-traditional learners

Members noted that these impacts are likely to be uneven across the sector, as independent and specialist providers tend to enrol higher proportions of mature learners and students returning to education later in life. These providers are often particularly effective at reaching such students but are also more likely to face constraints around *.ac.uk* email access, licensing, and institutional IT systems. As a result, assumptions that assistive software is readily available through mainstream or institutional provision may have a disproportionate impact in parts of the sector supporting high numbers of mature and non-traditional learners.

Contact IHE

- For more information, or to speak to someone about this consultation response, please email info@ihe.ac.uk
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