

## Response ID ANON-1BE2-2T2P-J

Submitted to Assistive software funded through Disabled Students' Allowance  
Submitted on 2026-06-17 14:24:06

### Introduction

#### Introductory questions

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

Name:  
Henry Carter & Leah Buttery

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

Email address:  
lusu.insight@lancaster.ac.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:  
Lancaster University Students' Union

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

Charity

Other (please specify):

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::

There are a number of DSA recommended tools whose AI features or integrated functionalities would conflict with Lancaster's institutional policies. We feel it is a fundamental error of judgement to assume confluence of inter-institutional practice to a point where a single policy standpoint could be derived. Furthermore, it would be a mistake to assume that all interactions with AI, especially when integrated into otherwise human-led software, within an institution fit within one policy per institution.

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

Please comment below::

DSA should publish and regularly update a list of approved providers and software centrally. It is vital that DSA assessors make it clear to students where DSA-approved software may not be permitted by their institution. We feel it is the duty of HEPs and DSA to communicate effectively to protect students and academic integrity.

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

Please comment below::

The binary presented here between generative and non-generative artificial intelligence is unhelpful and false. Many of the software listed in the consultation proposal, and already in-use by students in their day-to-day lives, incorporates some elements of gen-AI. Consideration needs to be given for a future-proofed policy that predicts the expanding integration of gen-AI in software.

Inclusion of gen-AI software in the proved software list directly conflicts with institutional policies on academic malpractice. Formal endorsement for student use of gen-AI in their studies also runs against the views of many of our students, who see the use of gen-AI as a matter of fairness and integrity.

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::

Online and free-to-use derives are much less privacy safe, and students should not have to risk any kind of safety breach just because they are disabled and need extra help.

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

Please comment below::

AI can be effective as an additional layer of student support, though not a replacement for all-important specialist human-led support services. Students are, in part, turning to AI systems to fill the gaps in institutional provision for formal support. This is happening due to necessity, not because they inherently prefer the AI system.

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::

General use AI tools lack any specific ethical or functional considerations for the experience of learners and learning. They also lack the Universal Design for Learning foundations found in specialist educational software.

## 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::

Research suggests that approximately 20% of DSA applicants drop off between their needs assessment and their equipment receipt. The £200 contribution is already a huge barrier to access for many disabled students. Remarkably, this is within a DSA system that is designed to level the playing field for disabled students.

These proposals look like the beginning a trend towards severe cost cutting in the support for disabled students. In effect, 7 of the 12 categories of software are being cut. We would like the government and DSA to be overt in its intent in its proposals.

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

Please comment below::

We find the definition unclear and unnecessarily opaque to students. Our concern is that such a vague definition will lead to inconsistent application.

We would suggest that the definition would be more usable if linked to specific access needs rather than software-type.

### Composition and mind mapping software

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

Please comment below::

Replacing funded composition and mind mapping software with free alternatives would significantly reduce the quality of support for many disabled students. The free-to-access alternatives are often not comparable in quality or the features they offer. Free-to-access software often requires users to pay for important functionality.

This proposal has been developed on incorrect information. For example, Appendix 1 lists products such as Claro and iThoughts which no longer exist. Composition and mind-mapping software have also been grouped together, yet they have different functions. The free alternatives that are suggested for mind-mapping are linear productivity tools, and so aren't suitable as mind-mapping software (which is meant to support students with externalising non-linear thinking).

## 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 quality of free to access note-taking and captioning software is often not the same standard as paid-for software. Despite supposedly being free, the free-to-access tools sometimes require subscriptions to access important features. The captions on free software can be poor quality and incorrect. This is particularly an issue for subjects with complex, technical language, e.g. biosciences. The free-to-access note-taking software often have restrictive usage limits which can be used extremely quickly by learners.

The proposal assumes that HE providers are complying with their duties under the Equality Act in making their teaching accessible. In Disabled Students' UK 2025 Access Insights report, it was reported that 61% of disabled students said that most of their lectures were recorded, while 30% said their lecture slides or notes weren't made available to student before lectures.

## Optical Character Recognition (OCR) software

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

Please comment below::

We support the continued funding for OCR software.

## Presentation support software

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

Please comment below::

While any student may find presentation support software helpful, for some disabled students, this software is vital for being able to complete their studies. Presentation software currently funded through DSA can be the critical tools for students with anxiety, ADHD, or autism. The free-to-access tools do not have the same functionality as specialist software. For example, free-to-access tools will merely support the creation of slides, whereas the paid-for software offers features which help with rehearsal and post-presentation review.

## Research and referencing software

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

Please comment below::

The basis of this proposal that "there generally isn't a specific disability-related need for this software" is completely incorrect. While this software can be a helpful extra for students who aren't disabled, for disabled students this software can be essential for helping them to complete their studies.

The quality of free-to-access software is simply not up to the same standard as the paid-for software. For example, Pro-Study (paid-for, specialist software) provides detailed feedback on structure, clarity, and readability across full texts, helping users organise and develop ideas. Conversely, free software like QuillBot has much more restrictive features like basic paraphrasing or simple citation generation, usually with usage caps. Free-to-access tools like Zotero have data storage limits which require students to have to manage storage and/or work across multiple systems, creating a further cognitive and organisational burden.

## Revision software

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

Please comment below::

There is a difference between any student finding this type of software a helpful extra, and disabled students needing this essential software to be able to carry out their studies.

Free-to-use revision software often has usage limits which don't make them useful for study, and don't have all of the same features that the paid-for software does. This means students will end up having to use several different free tools to cover all of the functions that one paid-for, specialist tool

incorporates.

## 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 support the continued funding for software to support vision impairment.

## Speech-to-text software

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

Please comment below::

This proposal fails to consider the specific support offered by this software for neurodivergent students. Only providing funding for students who rely on speech recognition as their primary method of written communication disregards the fact that speech-to-text software also provides vital support for students with ADHD, Autism, AuDHD, dyslexia, and other disabilities.

Speech-to-text software helps students who have to manage fatigue, pain, or fluctuating conditions. In particular, for students managing fatigue, multiple modes of input may be needed for producing notes and other work. Speech-to-text, as one mode of input available to someone is too fatigued to write, enables the student to continue learning and studying.

## Text-to-speech software

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

Please comment below::

The free-to-access software is not to the same standard as the paid for software. It is fundamentally unfair to create a higher threshold for justification for support for students with dyslexia, ADHD, autism, etc. than students with a visual impairment. All disabled students should be provided with equitable levels of support. Text-to-speech software is also used by many neurodivergent students to help with processing and helps ensure they can keep up with course reading.

Free text-to-speech software is not as user friendly. The voices used are often robotic and/or disjointed which makes processing more difficult. Paid-for software also offers enhanced features which can be essential for disabled students, such as dual-colour synchronised highlighting, customisable reading rulers, OCR for scanned and locked documents, dyslexia-friendly font overlays, and paragraph chunking.

Having to rely on free software means students will have to use a mix of several different tools to replace one paid-for software. For neurodivergent students in particular this could prove overwhelming and difficult to manage.

## Time and task management software

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

Please comment below::

While this kind of software can be useful for any students, for disabled students time and task management software is not just a convenient extra, it can be lifechanging.

Paid-for time and task management software can be tailored to a particular student's needs in a way that free software can't. Free tools expect that students can manage things like breaking down tasks, sequencing work, and estimating time. These are tasks that students with ADHD, autism, specific learning difficulties, mental health conditions, chronic illness, and fatigue often need support with. The wellbeing support provided by paid-for tools must not be downplayed or devalued. For example, Brain in Hand can be incredibly stabilising for neurodivergent students.

## Training software

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

Please comment below::

We support the continued funding for training software. We would however expect DSA, should the move be made towards a wider range of online systems, to expand the training available to match the expanded training needs of service users working across a number of different platforms.

## Typing tutor software

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

Please comment below::

Free-to-use typing tutor software is not the same as having a tailored package that meet a student's own specific requirements. Paid-for typing tutor software has useful and important features which minimise reliance on memory recall, as well as screens with dyslexic-friendly fonts, colour filters, and screen-reader compatibility.

## 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::

It is very worrying that types of exceptional circumstances haven't already been considered when developing these proposals. This suggests there hasn't been detailed analysis done of the impacts of these proposals on disabled students.

It is impossible to do a proper assessment of these proposals without knowing what exceptional circumstances would be considered. Without this we don't know how many students will be impacted, nor which disabled students will be impacted. Having the exceptional circumstances clause for most types of assistive software will likely mean a lot more students appealing DSA decisions based on exceptional circumstances. This will not only be stressful for the individual students, however it will be costly and time-consuming for SLC.

## 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 strongly oppose this proposal. The software a student receives should be based on an assessment of their need, and the most appropriate software should be provided based on these needs. Funding only the lowest cost software could therefore mean that students aren't using the software that is most suited to their need. We worry that this approach may result in software providers gaming the system, e.g. they may temporarily undercut competitors to secure contracts, then increase prices later or reduce support quality.

## Equality Impact Assessment

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

Please comment below::

Consideration needs to be given for the needs of the disproportionately mature and female recipients of DSA support. The government also needs to carefully consider the intersecting impacts for students who are also marginalised by their ethnicity, socio-economic class, age, or gender. For instance, we do not feel proper consideration has been given to the impact of the £200 contribution on lower-income students.

## Appendix 1 - Software List

## Appendix 2 – Demanding Software

## Appendix 3 – Protected characteristics of DSA recipients