

Introduction

The British Dyslexia Association (BDA) is the national charity working with and for people who are dyslexic. For over fifty years we have been at the forefront of knowledge and understanding about dyslexia. Last year we supported over 1 million children, young people and adults through our free services and access to our information. We welcome the opportunity to contribute to the *Assistive software funded through Disabled Students Allowance* consultation. We also acknowledge the detailed analysis that has been completed by the British Assistive Technology Association (BATA) and we support their detailed and substantial response to the consultation.

Summary

Disabled Students Allowance (DSA) has existed for over 50 years and is arguably the most successful disability support structure in UK education, closing the attainment gap and ensuring equal access to higher education for disabled students wherever they choose to study, whichever course they choose and regardless of their disability. DSA exists in recognition that disabled students face barriers which other students do not. Its foundational basis is the Equality Act 2010 obligation to provide reasonable adjustments, the duty to ensure disabled students are not placed at a substantial disadvantage compared to non-disabled peers.

The BDA believe that functional impact, not diagnostic label, is the proper basis for adjustment under the Equality Act 2010. This is the basis on which DSA support and equipment is currently funded. This consultation appears to reverse that principle, moving away from a needs led system which asks what support a disabled student reasonably requires because of their disability, to a starting point which seems to be that free or mainstream software should be presumed to be sufficient unless the student can prove otherwise.

This contradicts the Holmes Review of 2022 principle that student-centred support is the "touchstone" by which DSA is measured.ⁱ It also appears to shift considerable onus onto the Higher Education Provider (HEP) to provide assistive technology to support dyslexic students to replace that currently funded by the DSA, without any analysis of the feasibility of HEPs to do this.

"Exceptional circumstances" is undefined. An undefined threshold will produce inconsistent outcomes across needs assessors and will create an unnecessary administrative burden for needs assessors and Student Finance. The BDA would not expect to see a significant reduction in the number of dyslexic students needing DSA funded specialist technology since browser

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and free access versions are not functionally equivalent or designed to meet disability related needs. We therefore anticipate that there will be a significant number of exceptional circumstance applications if these proposals are implemented. Alongside inconsistent outcomes and unequitable access to core support, this new threshold will create delays for students accessing their software and will result in many commencing their course without the necessary software in place. We are concerned that many will have to “fail” with free to access software before they are able to make the case for funded support.

We recognise that there has been considerable advancement in technology, most recently with the introduction of Artificial Intelligence (AI). Many computers and devices now come with built in accessibility features. We agree that it is important that DSA funded software to support specific disability needs is reviewed periodically to ensure that it continues to meet the needs of students and that public money is spent wisely. However, we are concerned that the specific proposals within this consultation do not achieve this. Rather these proposals will withdraw statutory disability adjustments which will disproportionately impact dyslexic and other neurodivergent students who rely on this support to enable them to access higher education.

Specifically, we are concerned that there is a lack of evidence to support the premise that built in browser features, apps and free tools designed to “hook” in users to upgrade to a paid for product can replace specialist disability designed funded tools in most cases. The existence of a free alternative does not automatically mean that it provides equivalent accessibility. Nor is there the evidence from the Department for Education to support that this is the case. The Equality Impact Assessment suggests to us that if these reforms are implemented, dyslexic students will no longer enjoy equal access to higher education.

It is important to recognise that a free alternative is not necessarily an effective or an equivalent alternative, and just because a free version is available it may not be capable of removing the disadvantage experienced by a disabled student. Free tools are not designed to support disability needs. They may be sufficient to increase productivity for non-disabled individuals in the workplace, or for occasional use by non-disabled students, but they are not suitable for dyslexic students as a reasonable adjustment to support academic study, or to replace clinically developed tools that help scaffold and develop the skills that dyslexia impairs; tools which do enable dyslexic students to access academic study on a level footing.

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The removal of DSA funded specialist tools would require students to use a range of separate tools to achieve what a specialist solution can provide in one environment. This approach would significantly increase cognitive load and create additional organisational demands on students who already find this challenging. For dyslexic students, managing multiple tools will introduce additional barriers which will make it harder for them to start, sustain and complete written work. Our concern is that these students, out of necessity, may use unregulated AI tools and we have serious concerns that this will impact upon the academic integrity of their work, risk claims of cheating, while also failing to support them to develop independent learning skills which are needed for academic study and in the workplace.

Most critically, this consultation has not been co-designed with disabled students and is in direct conflict with the Government's own Get Britain Working White Paper, published in November 2024, which set out the most ambitious employment reforms in a generation, backed by £240m of investment, with the explicit goal of supporting disabled people into sustained employment and achieving an 80% employment rate. This cannot be achieved while simultaneously removing the educational support that makes degree completion, graduate employment and independent working life possible for disabled individuals.

It is in equal conflict with the SEND reform agenda, which has invested £9.5m in neurodiversity inclusion in schools and committed to a generational overhaul of support for disabled children and young people. The disabled students affected by these DSA proposals are the direct continuation of that cohort, moving onto higher education expecting the support that was built around their needs to continue. These proposals tell them it stops here.

If implemented, these proposals risk dismantling the equality framework that currently exists to support vulnerable students – the very framework that is a core part of ensuring equity in higher education, and access to high skilled graduate employment.

Recommendations

- Funded specialist assistive software must be retained across all software categories and provided to all students based on their individual needs, not restricted to an unspecified “exceptional circumstances only” basis.

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- Remove the “exceptional circumstances” access threshold and continue to delegate decision making authority to experienced DSA needs assessors based on documented individual student needs.
- Withdraw the lowest cost software product available procurement rule and direct needs assessors to find the most cost-effective solution to meet student needs. It must be accepted that this will not always be the lowest cost option.
- Replace the proposed feature matching methodology with a standards-led approach developed in partnership with the sector.
- Develop a sector-wide policy which distinguishes AI used as a reasonable adjustment to support dyslexic difficulties from AI used to generate academic content that the student passes off as their own work.
- Commission a robust Equality Impact Assessment that includes a disability-type breakdown of impact across the sub-groups the proposals affect and considers the impact of intersectionality.

The case for DSA funding

DSA is based on a simple principle. If a student faces additional barriers because of a disability, support should be available to help level the playing field. The consultation appears to be shifting away from looking at what support the disabled student needs to access higher education on an equal basis to what is the minimum level of support that can now be justified. This change is not supported by evidence provided by the Department for Education to demonstrate that this could be implemented while ensuring that dyslexic students continue to enjoy equal access to higher education.

The importance of assistive technology within the Disabled Students' Allowance framework is well evidenced. ⁱⁱ The 2019 evaluation of DSA highlights the critical role that funded assistive technology plays in supporting student success and outcomes. The report found that around three-quarters of DSA recipients received specialist software and equipment to support their studies, and that this support contributes directly to enabling students to participate more fully in their courses and build confidence in their ability to complete and succeed. Notably, three in five students who felt confident about passing their course stated they would not feel confident without DSA support, demonstrating the significant impact of funded assistive technology on academic outcomes and progression. Crucially, DSA support is also linked to improved student confidence, retention and outcomes, with students who receive appropriate support more likely to complete and succeed in their studies.

Analysis by the Office for Students (OfS) ⁱⁱⁱ shows that Disabled Students Allowance halves the unexplained attainment gap for disabled graduates. Recipients of DSA have higher course completion rates compared to their unsupported disabled peers and over 70% transition into highly skilled employment or post graduate study.

Cutting the tools that dyslexic students need risks widening the attainment gap, and increasing student dropout rate, contributing to the growing number of young people who are not in education, employment or training (NEET). Removing DSA funded software for dyslexic students runs counter to the stated aims of making education more inclusive and will undermine initiatives to reduce the reliance on benefits, decrease youth unemployment and boost the number of disabled individuals in employment.

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Proposals

This consultation appears to proceed on the assumption that if a free tool exists, the student's needs can probably be met. But accessibility is rarely about whether something technically exists. It is about whether it works for that individual student. Removing access to paid for software for dyslexic students demonstrates a fundamental misunderstanding about the impact of dyslexia, a disability protected by the Equality Act 2010. Dyslexia is a processing difficulty which impacts cognition and learning as well as executive functioning skills; the key skills needed for independent academic study in higher education.

Specialist Assistive Technology supports the specific cognitive impairments that dyslexia creates, levelling the playing field to ensure equal access to higher education for dyslexic students regardless of their specific challenges. There is no logic in proposing to remove these paid for tools from a dyslexic student but enabling a visually impaired student to retain funded access. This suggests that a dyslexic individual is "less disabled" than one that is visually impaired, when both are disabilities covered by the Equality Act 2010.

The Equality Impact Assessment acknowledges that these proposals will disproportionately affect female and neurodivergent students, many of whom will be dyslexic. Our concern is that these proposals create a diagnostic hierarchy. While we support the retention of DSA funded specialist software for visually impaired students, we fail to see why equivalent provision for dyslexic students will only be available under exceptional circumstances.

Artificial Intelligence

Features of AI are developing faster than the conversations to understand their impact on academic integrity where submitted work must be the students own.

HEPs are responsible for their own policy on AI and academic integrity. Consequently, there is considerable variation between policies, and the boundary between an acceptable AI feature and a generative function that an HEP would consider to be misconduct varies. This creates great uncertainty for students about whether and how they can use their specialist DSA funded software. We were recently contacted by a DSA funded student at Leeds Birbeck University accused of misconduct in the production of her dissertation. The case study below highlights the difficulties she faced.

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Case study

A dyslexic student in her final year has a laptop provided by DSA with specific programmes such as Grammarly to aid her writing. These were agreed with Leeds Birkbeck University as she started her course.

In April 2026 she submitted her final dissertation which created an AI score of 80% from Turnitin. Not from copy/pasting sections of AI generated content but from the ongoing DSA support programmes such as Grammarly she used while writing this extended piece. She declared when and how she had used the tools and AI to support her writing, following the "Academic Honesty" guide from the university. She was very careful about her dissertation as she had a similar meeting last year following submission of an extended essay. She was cleared when she explained the system on her laptop and how she had used the programmes embedded within it.

Following the submission of her dissertation, she had three meetings about the high AI score. Initially she was told that she should not have used the programmes given to her by the DSA and just to be herself. The university suggested that she was giving herself an unfair advantage. She was helped to write a detailed email explaining the process of creating her dissertation and the tools she had used to support her dyslexic challenges. She was asked to include the "proof" from the DSA for the programmes and the laptop she was using. The burden of proof was on her to clear her name but the programmes she used are specialist DSA funded software built into everything she does on her laptop.

With support from charities and a disability specialist the case was eventually dismissed and the student was found to have followed the university's integrity policy with appropriate declaration and transparency in how her work had been produced, but this clearly illustrates the difficulties for students and the need for a sector-wider policy which distinguishes AI used as an adjustment to support dyslexic difficulties, from AI used to generate academic content that the student passes off as their own work. This is a genuine problem for all HEP and one which requires better understanding.

The features in specialist software funded through the DSA are more likely to be compliant with HEP policies because they are designed to support the

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student's own work, not generate or substitute the content with machine generated work. So, for example, specialist composition software is designed to scaffold the student through the stages of the writing process – something that many dyslexic students need as a reasonable adjustment to enable them to logically structure their ideas. While the software helps with the structure it is the student that is producing the writing based on their own thoughts and ideas. None of the features in DSA funded specialist software generate original academic content for a student to pass off as their own.

Likewise, specialist note taking software enables a student to listen to a lecture while the specialist software takes notes and generates summaries of the lecture. Dyslexic students can struggle with multi-tasking activities such as note taking due to poor working memory and processing difficulties. Specialist note-taking software acts as a reasonable adjustment for a dyslexic student to perform a task that a non-dyslexic student can do themselves. It ensures that a dyslexic student can access the lecture content and a set of study notes in the same way as their non dyslexic peers.

We do not believe that DSA funding should be used to fund consumer generative AI tools such as ChatGPT, Claude or Microsoft Copilot. These products are not designed to support disabled students scaffold their work. Their primary function is to generate content. Neither are they an acceptable substitute for the specialist DSA funded software recommended for dyslexic students by a needs assessor based on an assessment of a student's individual needs, supported through evidence provided in their diagnostic assessment report as part of the process of applying for DSA. We recognise that these AI tools have a role to play in supporting dyslexic individuals in the workplace, to help produce emails and reports to a business standard but here there is a fundamental difference because the workplace and academic study which is assessing an individual's ability to produce work for a specific qualification.

Free versus paid for software

Browser tools are not a substitute for accessibility based customisable tools designed as a reasonable adjustment to support a disability need. For example, built in dictation does not enable the option to train the software to recognise your voice so work is full of inaccuracies where words have been misunderstood. This is challenging for a dyslexic individual who may not recognise these discrepancies between what they have said and what the software has written.

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Free Text-to-Speech has limited options for selecting a human sounding voice or changing speed of delivery; essential features for a dyslexic student who already has challenges processing information and cannot afford further cognitive load in having to “think” about what is being said. Free spell-checking software can struggle to offer correct spelling for phonetically spelt words. Many free apps such as those for note taking have strict monthly usage caps which are wholly insufficient for academic study needs.

HEP functionality

We recognise that many HEPs have software licences or systems in place to provide access to technology, but this varies considerably between different providers. Reliance on the HEP will create the “postcode lottery” of support for dyslexic students which is an unfortunate characteristic of school and college education - something that the DSA has ensured is not a feature of higher education. These proposals have not looked at the feasibility of HEP to support students or the impact on students of the reliance on HEP to meet this need and this must happen before changes to DSA are implemented.

Composition and mind mapping software

We do not support the proposal to withdraw funding for composition and mind mapping software except in “exceptional circumstances”. This proposal assumes that feature availability equals functional equivalence. This is not the case. The free tools that are proposed to replace DSA funded specialist software have been designed for non-dyslexic users who can plan, organise and present their ideas logically. Dyslexic students have difficulties with cognition which can impact their executive functioning abilities and require structured support and scaffolding to do these things. Free tools cannot provide this functionality.

Specialist mind mapping tools

These enable dyslexic individuals to process information in a non-linear format so that they can formulate and structure their ideas before they begin writing. Microsoft OneNote, PowerPoint, Whiteboard and Word, which are some of the suggested free alternatives, do not have this functionality. They are essentially a board on which a student can create a mind map of static shapes. Much like using post it notes or paper, they do not connect the ideas so that if a student moves a central concept the associated branches do not follow and must be manually rearranged. For dyslexic students this creates cognitive overload and increases the barriers that the specialist tools through DSA funding are designed to remove.

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Specialist mind mapping tools have semantic intelligence which enables the software to identify the logical relationship between ideas. So, the software manages the organisation of the ideas which enables the student to focus on thought and analysis. Specialist tools also enable the visual map to be translated into a structured multi-level outline which the student can use. This is an essential tool within specialist mind mapping tools which enables dyslexic students to produce written assignments. This must be available for all dyslexic students where a needs assessor identifies this need; not restricted to “exceptional circumstances only”.

Specialist composition tools

These support the critical early stages of composition where dyslexic individuals face the greatest barriers. Specialist tools are designed to scaffold support to help dyslexic students understand the assignment question and then plan and structure their response, including help with organising and integrating content from other sources. Alongside this they help dyslexic students to build transferable strategies and independent academic skills over time.

The proposal to replace these tools with AI content generators that produce work for the student does not support independent learning needed both for academic study and for the workplace. In addition, students using these free tools are likely to experience academic misconduct for cheating.

Recommendation

- Specialist composition and mind-mapping tools must be retained as DSA funded software for dyslexic students where this is identified by an experienced needs assessor as part of the needs assessment.

Note-taking, recording and captioning software

We do not support the proposal to remove DSA funded specialist note-taking, recording and captioning software and replace this with free to access productivity tools which are not designed to support accessibility needs.

Specialist note-taking tools, recording and captioning software help dyslexic students compensate for difficulties with processing speed, poor working memory and challenges with executive functioning skills which can prevent them from being able to participate in the lecture alongside taking meaningful notes.

Lecture content is often delivered at a faster pace than a dyslexic student can process, meaning that they miss content if they are trying to multi-task and take their own notes. Specialist note taking software enables them to focus on listening to and comprehending the lecture, confident that they will have an accurate set of notes from which to study, and that they can link these back to the lecture slides and the audio to revisit this and enable opportunities for overlearning which many dyslexic students need to ensure that this content goes into their long-term memory.

These tools support disability needs to ensure that dyslexic students have the same access to lectures as non-dyslexic peers. Specialist note-taking tools generate outlines, summaries, and quizzes from the recording which dyslexic students need for revisiting sessions to help ensure that new information is retained.

Free to access tools like Microsoft OneNote are not an adequate substitute. Free tools are not engineered for disability accessibility, so they do not include essential accessibility features. Notably these tools apply strict usage caps which would mean that most dyslexic students would typically use their entire month's allowance in the first week or would be required to self-fund to the paid for version, creating inequality of access, available only to those students who could afford to pay. Free versions also have limitations on where they can be used. For example, OneNote cannot be used on Mac or Chromebook. A reasonable adjustment cannot be conditional on the platform a student uses or where they are studying. Students need tools that are consistently available to access on all their devices and in all learning environments which will vary per course of study but might include lectures, seminars, labs, fieldwork, placements and home study.

Dyslexic students rely on specialist tools because they can produce a clean usable recording across lectures, online sessions and hybrid sessions, ensuring that the student can understand the recording with background noise, overlapping voice and understand who is speaking when. These tools enable the student to play back and trust what was recorded, not try and reconstruct what was said from a poor recording, which puts additional cognitive load on dyslexic individuals.

The tool must integrate audio, text, transcripts and slides into a single integrated recording that the student can navigate, not separate streams that they must integrate themselves.

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The recording must also be accessible in navigable chunks bound to slides and timestamps with visual cues such as labels, dual highlight and slide markers to that the student can jump to the relevant moment. Free to access tools do not offer the above accessibility functionality.

Specialist note-taking is built around single action interaction with features such as one-click navigation and accessible keyboard shortcuts which help support disability needs in live conditions when fast set up and highlighting of key points is required to ensure that the student captures everything that is said.

Free tools may be suitable as a productivity tool in the workplace, or for occasional use by non-dyslexic students but are not suitable for the rigours of academic study or as a reasonable adjustment for a dyslexic student.

Recommendation

- Specialist note taking, recording and captioning software must be retained as DSA funded software for all dyslexic students when this need is identified by an experienced needs assessor as part of the needs assessment.

OCR software

We do not support the proposal to create a threshold so that Optical Character Recognition (OCR) software is only available for students under “exceptional circumstances”. This software is essential for dyslexic students where their course demands that they need access to lots of printed material including published books and PDFs. The OCR technology enables them to turn this printed material into searchable data, thus reducing cognitive load and enabling dyslexic students to access this information in a format that works for them.

Recommendation

- DSA funded OCR software must continue to be retained as DSA funded software for all dyslexic students wherever this need is identified by an experienced needs assessor as part of the needs assessment.

Presentation support software

We do not support the proposal to withdraw presentation support software from dyslexic students. While we accept that all students experience some

level of difficulty or anxiety around presenting information, dyslexic students experience this in addition to specific disability related difficulties.

Oral assessments and presentations create a substantial additional cognitive load; problems with word retrieval under time pressure and the impact on working memory to multi-task reading, recalling and speaking live make delivery extra hard. Alongside stress which further impacts working memory capacity.

Only Microsoft PowerPoint continues to feature the speaker coach, but this tool is designed to enable individuals to practice, time and polish their presentation. Its format assumes that the student can focus and has good working memory, so it does not work as a disability enabling tool because its format creates on-screen real time prompts which act as a distractor for a dyslexic individual, causing them to lose their train of thought and preventing them from seamlessly continuing the presentation. This is not a disability adjustment. We believe that the removal of this funded software would withdraw a statutory disability adjustment for dyslexic students.

Recommendation

- Presentation software must continue to be retained as DSA funded software for all dyslexic students wherever this need is identified by an experienced needs assessor as part of the needs assessment.

Research and referencing software

The case for the removal of specialist research and referencing tools assumes that these are general study aids which support all students rather than a reasonable adjustment for a disability, and that free to access study aids are functionally equivalent. This is not the case. There is no single free tool that delivers the core features of this software as defined by the Department. For example, Google Scholar can locate papers but does not summarise them, manage a library of sources or generate formatted citations. Copilot can summarise pasted text but does not search academic databases so the citations it produces are unreliable and risk a student being exposed to an academic integrity investigation.

Specialist tools are a reasonable adjustment, not a general study aid. They enable dyslexic students to access, process, organise and produce academic work on an equitable basis with non-dyslexic peers. These tools help remove specific barriers such as cognitive overload, difficulties with large volumes of reading and processing dense academic language.

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Restricting access to paid for specialist tools to exceptional circumstances will not eliminate the disability barriers that dyslexic students face and will place them at a substantial disadvantage unless they can self-fund specialist tools.

Recommendation

- Specialist research and referencing software must continue to be retained as DSA funded software for all dyslexic students wherever this is identified by an experienced needs assessor as part of the needs assessment.

Revision software

We are concerned that the rationale for the removal of DSA funding for specialist revision tools appears to be that revision tools are useful for all students. We would agree that these tools can be useful for any number of people, but they are essential as a reasonable adjustment for dyslexic students and DSA should continue to fund them on this basis. Removal of these tools would place dyslexic students at a substantial disadvantage.

Research evidence supports that dyslexic students have greater difficulty across key skills that are needed for effective revision. Revision makes simultaneous demands on working memory, sustained attention and executive functioning.

Dyslexic students have slower speed of reading, difficulty scanning texts to key themes, poor working memory and need to rescan texts many times to achieve comprehension. In addition, they face challenges with time management and drawing up revision schedules. Free to access revision tools are designed for the general student population, not for dyslexic students with disability related needs. Free tools have functional restrictions and are not purpose build to support the needs of dyslexic students and others with cognitive challenges.

Recommendation

- Specialist revision software must continue to be retained as DSA funded software for all eligible dyslexic students wherever this is identified by an experienced needs assessor as part of the needs assessment.

Speech-to-text software

We do not support the proposal to remove DSA funded specialist speech-to-text software for students that do not use full voice control of a device. The proposals in the consultation are of concern to the BDA because they would significantly impact dyslexic students who rely upon speech-to-text to access academic written work but do not use full voice control of a device.

Evidence shows that when used well specialist speech-to-text software helps remove some of the barriers that dyslexic students face in producing written academic work, improving writing quality, fluency and use of language.

Dyslexic students are not simply transcribing speech; they use speech-to-text software to enable them to produce structured work to an academic standard. They rely on the software to accurately record their spoken word. Many of the free to use dictation tools do not have the ability to be “trained” to recognise the individual student’s voice. Consequently, they produce words, but the accuracy level does not match that which is possible to achieve with specialist software. This is of particular concern for students who have strong accents or speech difficulties which may impact the accuracy rate of the software. Specialist tools provide adaptation to individual speech patterns and accents together with structured training and support. Free or built in dictation tools are not designed to meet a disability need and are not equivalent to specialist speech-to-text software. They require a student to monitor, correct, restructure and format the dictated words to ensure accuracy. As a result, free tools do not remove the barrier that students face, indeed it shifts it back onto the student. Dyslexic students have difficulty identifying errors, so work may not be accurate, or they might lose their idea while correcting the sentence.

Recommendation

- Specialist speech-to-text software funded by the DSA must continue to be available to be available for dyslexic students who use this to support with written communication. It must not be limited just to those students who also rely upon it for voice control of devices.

Text-to-speech software

We do not support the proposal to remove funding for specialist text-to-speech software and replace this with free or built in browser tools. Specialist text-to-speech software provides multi-sensory, cross platform functionality

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which students can configure to support their own disability needs. This functionality cannot be replicated across the full range of environments in which dyslexic students work.

Free tools read text aloud in a single environment but are often unable to read within the source area that the student is working. Specialist software provides dual-colour synchronised highlighting, customisable reading rulers, OCR for scanned and located documents and cross platform functionality built around the needs of disabled students.

A student who must rely on free tools may require up to four separate solutions to cover the formats they will encounter in a single academic week, each one requiring reconfiguration, new interfaces and additional cognitive effort. Dyslexic students need consistency and low cognitive overhead to support disability needs. The fragmentation that free tools create is not a minor inconvenience, it is a significant barrier to learning.

BDA is also concerned that free tools increase complexity and this will increase the need for additional training support from disability support services. HEP site licences are not a substitute for individually funded provision as many of these do not enable students to access these on personal devices, meaning that they cannot be used when students are studying off campus.

Recommendations

- Specialist text-to-speech software should remain within scope of DSA as standard where it is required to meet disability-related needs as determined by an experienced needs assessor.

Time and task management software

We do not support the proposal to remove DSA funded specialist time and task management software. This proposal assumes that free or built in browser tools that enable task management provide equivalent support to specialist assistive technology. For dyslexic students, time and task management software is needed for core support to help remove the disability barriers they face with planning, memory, prioritisation, task initiation, time awareness and overwhelm. All these barriers can impact a student's ability to start, manage and complete academic work.

A free tool must remove disability related barriers in real study conditions for it to be a suitable alternative to specialist DSA funded software. Although many

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time and task management tools exist, many disabled students have already tried access to free tools before a DSA assessment and report that these tools have failed to meet their needs.

Free tools such as calendars, task lists and reminders are often reactive rather than supportive. They require a student to already have the executive functioning skills needed to break down tasks, sequence work, and estimate time. The very skills that dyslexic students need the tool to support. Free tools often need multiple tools to replicate one specialist product. This increases fragmentation, cognitive load and training requirements. Free tools also have limited training and technical support.

Recommendation

- Time and task management software should remain within scope of DSA funded software as standard where it is required to meet disability-related needs as determined by an experienced needs assessor.

Training software

We support the proposal of continuing to fund training software and making no changes to that aspect of the policy. However, we are concerned that the consultation does not define what the “current approach” to training software is in relation to the proposed changes set out in the consultation. The effectiveness of training software depends heavily on the quality and suitability of the assistive tools that students are using. A commitment to training software is only meaningful if it sits within a system that continues to fund the right tools based upon individual student needs.

Supporting students to use assistive technology effectively is central to student independence and to positive outcomes, regardless of which tools are being used. But training software does not exist in isolation, it is closely linked to the wider assistive technology ecosystem. It is not clear from the consultation whether training software would continue to be funded for students who are recommended free or built in browser tools, or only when specialist paid for software has been agreed.

The proposal to move to free tools would significantly expand the scope and complexity of what training software is expected to cover. Specialist DSA funded tools typically have a defined approved feature set which means that training software publishers know precisely what to build content around.

Replacing specialist tools with an undefined and constantly changing range of free products would make it significantly harder to deliver training content to the same standards. We are also concerned that no amount of training can compensate for free tools that do not fully meet a student's needs. Training cannot make an inadequate tool adequate. Specialist assistive technology is designed to scaffold strategies, and training software is built to support these.

Recommendation

- DfE to define "current arrangements" in the context of the consultation proposals.

Typing tutor software

We disagree with the rationale that typing tutor software should not be funded because touch-typing is a "skill that many students may find useful unless they are using dictation or speech-to-text software as an alternative". There is a critical distinction between generic typing software and assistive technology designed to support dyslexic students.

While touch-typing may be a useful skill for all students, it is an essential skill for many dyslexic students because it is used as a foundational cognitive skill to support effective learning. It can facilitate spelling, and because typing is automatic it can reduce the cognitive load which enables a dyslexic student to focus on the content of what they want to say, not the mechanics of getting their ideas down on paper.

Free typing tools offer many of the core features but are not suitable for many dyslexic students because they rely on memorisation. Specialist tools are designed to offer a multi-sensory approach which reduces cognitive load, minimises memory recall, and enables students to change the font size and colour of the screen to suit their own individual needs.

Recommendation

- Typing Tutor software should remain within scope of DSA funded as standard where it is required to meet disability-related needs as determined by an experienced needs assessor.

Exceptional circumstances

The consultation proposals do not include a definition of exceptional circumstances, so our response is based on a generic concept of a threshold policy.

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If the threshold remains undefined in practice, it will produce inconsistent outcomes across needs assessors and will create an unnecessary administrative burden for needs assessors and Student Finance. If these proposals proceed as stated, we anticipate that there will be a significant number of exceptional circumstance applications, because student needs remain unchanged and the functional suitability of the free alternatives will not meet the needs of most dyslexic students applying for DSA support.

Alongside inconsistent outcomes and unequitable access to core support, this new threshold will create delays for students accessing their software and will result in many starting their course without the necessary software in place.

For an exceptional circumstances threshold to operate in practice it will need to rely on the professional judgement of the needs assessor, backed by evidence that the student routinely submits as part of their DSA application, including diagnostic assessment reports. Students should not be expected to produce additional evidence from a diagnostic assessor or medical practitioner to present a case for exceptional circumstances. There must be a clear route to escalation and review when applications are rejected. The burden of proof and escalation must not fall on the student to navigate and manage.

Students need support in place for the start of their course, so decisions on exceptional circumstances must be timely. The Department must establish and publish target turnaround times for these decisions and monitor and publicly report performance against them.

We believe that for an exceptional circumstances threshold to operate in practice it should be at the discretion of the needs assessor working to published guidance from the Department.

We would expect this to include assessments where the needs assessor judges that free access or built in browser tools are functionally inadequate for the individual student based on their own disability specific needs.

We would expect that where there is evidence that a funded product has been the student's "normal way of working" through education, this would continue to be funded through DSA for higher education.

Dyslexia commonly co-occurs with other neurodivergent conditions including ADHD, dyscalculia and autism. These students will have a more complex profile of needs which will not be met by free software which is designed to

support only a primary need. Those with co-occurring needs should automatically qualify as exceptional circumstances.

We would also expect exceptional circumstances to apply when the free software is platform locked and is incompatible with the student's own devices.

Free to access software struggles to handle subject-specific terminology accurately so students in disciplines such as medicine, law or engineering should qualify as exceptional circumstances so that they receive a funded product that is compatible with specialist terminology.

Speech recognition software relies on an accurate recognition of the student's own voice. Free to use options are less able to recognise strong accents or those with a speech difficulties and funded software can be "trained" to recognise this and so a student with an accent or speech difficulties should automatically qualify for exceptional circumstances.

Some dyslexic students have visual processing requirements because of a co-occurring visual difficulty. These students will need software that enables them to select a dyslexia friendly font, customisable reading rulers, and colour filters so that they can customise their screen to meet their own specific viewing requirements. Where there is evidence that students have previously used coloured overlays, lenses or modified exam papers they should automatically qualify for exceptional circumstances.

When a student's recommended assistive technology depends on integration between products as part of the reasonable adjustment to reduce cognitive load, exceptional circumstances must apply if the free alternative does not interoperate with the rest of the package.

Recommendation

- The Department must define "exceptional circumstances" and produce guidance for needs assessors to use.

Lowest cost software products

We have concerns about the proposal to fund the lowest-cost software product within a category. This is not a student-centred approach; it is a procurement-led process which is likely to see suppliers remove product features to keep the price competitive on their products. While this approach

may lower DSA costs, it will also impact product functionality, effectiveness and student outcomes.

We are concerned that a price comparison approach risks a product comparison based on feature labels alone, that may differ materially in the design and accessibility that ultimately determine whether the product is usable for an individual student and their specific disability related needs. Different students need different products. Two dyslexia students may be recommended tools from the same software category but the optimal product for each may differ based on their own individual disability needs, and with regard to the course of study and the additional requirements that might present for learning environment or use of specialist terminology.

A rule that defaults to the lowest cost product overrides clinical judgement but also risks providing students with products which do not meet their disability needs and may not be used, and this is not a cost-efficient use of public money.

Recommendation

- Lowest cost rule should be withdrawn and replaced with a value-led procurement approach that ensures that the professional needs assessor has authority to select the best product for the student where this is evidenced by the student's assessed needs.

Equality impact assessment of the proposals in the consultation

The BDA has concerns about the equality impact of the proposals which we do not think are adequately addressed in the EIA. This rates the impact on disabled students as "neutral overall, with a possibility of slight negative impact".

The proposals as set out in the consultation document will reduce or remove specialist assistive technology from a substantial majority of dyslexic students, leaving them dependent on free or HEP provided alternatives, unless they are able to self-fund the specialist product that specifically meets their needs.

The case that free to access or built in browser features are suitable alternatives is not evidenced in Department's data and the software "matching" detailed in the consultation document has many assumptions and inaccuracies. These free products are not designed to meet disability related needs of students in academic study and do not constitute a reasonable adjustment under the Equality Act.

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If these proposals are implemented, dyslexic students risk experiencing increased cognitive load, hardware and platform exclusion, capped functionality, withdrawn features and a risk of academic integrity exposure. These are direct disability specific barriers to study, and without the specialist products to help remove these barriers we expect the impact on dyslexic students to be seen in lower attainment, lower retention, increased mental health pressure and reduced graduate employment outcomes. These are precisely the reverse of the outcomes that the existing DSA framework currently delivers.

The EIA acknowledges the “diagnostic hierarchy” - continuing to fund the same software products for visual impairments but withdrawing equivalent provision for dyslexic students. Both visual impairments and dyslexia are recognised as a disability by the Equality Act. Under the proposals a visually impaired student and a dyslexic student who experience equivalent barriers to study; barriers which can be reduced by the same assistive software, will receive materially different levels of support because their diagnoses fall within different parts of a proposed policy.

The current EIA aggregates all 88,000 DSA recipients into a single “disabled student” category but contains no analysis of the impact on students with different disabilities, so it is not possible for us to determine the true impact on dyslexic students. Given the level of change for dyslexic students within these proposals, we would expect the impact to be far greater than stated for the aggregated group.

We are concerned about the equality impacts in respect of race and linguistic characteristics that the EIA does not address. There are known word error rates in commercially available speech recognition systems which perform unevenly across speaker groups. These will compound disability barriers for dyslexic students where the default speech recognition software does not include functionality to “train” the software to recognise specific voices and pronunciation. This is likely to have a disproportionate impact on dyslexic students from minority ethnic backgrounds, or those who have a co-occurring speech impairment. The EIA contains no engagement with this evidence. Similarly, students with Welsh as their first language. DSA covers students in England and Wales, but the EIA does not engage with the Welsh-language equality dimension at all.

We also have concerns that these proposals will intersect with socio-economic status in ways that the EIA does not analyse. Free to access

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consumer tools which have capped usage limits and functionality which sits behind a pay wall, create a divide between disabled students who can afford to pay to upgrade and those who cannot. This compounds existing socio-economic disadvantage in higher education and falls hardest on dyslexic students from low-income households.

Recommendation

- DfE should commission a robust EIA that includes an impact analysis by individual disability type and includes the intersectional characteristics of race and socio-economic status which further impact disadvantage.

Conclusion

We recognise the need to review the assistive technology support provided to students through DSA funding. But we have concerns that these proposals, which are moving from a student-centred approach to a tool centred approach are in direct contradiction to the Holmes Review principle that student centred support is the “touchstone” by which DSA is measured.

We are concerned that too many dyslexic students will be impacted by these proposals which will require them to prove that a free tool is not sufficient to meet their needs, and this consultation is unclear on how this process will work in practice.

We believe that most dyslexic students applying for DSA will need some funded software. Students who deem free tools to be sufficient to meet their needs do not apply for DSA. Specialist text-to-speech with synchronised highlighting, OCR and visual scaffolding is foundational to enable dyslexic students to read academic content and free read-aloud features in browsers and apps are not substitutes to support a disability related need.

Specialist note-taking software that connects audio, transcript and slides into a single navigable piece is essential to ensuring dyslexic students can engage with lectures, without being capped by usage constraints of free to access alternatives, which also lack essential functionality.

Presentation software helps scaffold preparation, essential for supporting dyslexic students access oral assessment and cannot be replaced by slide presentation tools. The same is true across composition and mind mapping, research and referencing, revision, speech-to-text, time and task

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management and all the specialist categories of software currently funded for dyslexic students through DSA.

Specialist provision must continue to be funded by DSA where the disability barrier is severe enough to make free alternatives inadequate. Functional impact, not diagnostic label is the basis on which adjustment should continue to be funded, and this should continue to be determined by experienced DSA needs assessors on an individual basis, based upon the presenting needs of the student at the needs assessment.

We would welcome the opportunity to further engage as these proposals are formulated. If you have any questions or would like additional information, please contact Helen Goodsall, Policy and Helpline Manager, at heleng@bdadyslexia.org.uk.

ⁱ Holmes Review 2022 lordchrisholmes.com/report-disabled-students-allowance-dsa/

ⁱⁱ (https://assets.publishing.service.gov.uk/media/5f5241a08fa8f542a1f8dc36/Evaluation_of_disabled_students_allowances.pdf)

ⁱⁱⁱ <https://www.officeforstudents.org.uk/media/3828/beyond-the-bare-minimum-are-universities-and-colleges-doing-enough-for-disabled-students.pdf>