

Response to the Assistive Software Funded Through DSA consultation March 2026

Responding organisation: The Snowdon Trust

Category: organisation, charity

Happy to be contacted about response: yes

Executive summary

The evidence we have gathered points to serious concerns about the proposals, which are explored in full throughout this response. In summary:

- **The over-recommendation and under-use of assistive software.** The consultation misdiagnoses the problem of student overwhelm, which stems from inexperienced assessors, insufficient training and onboarding, and poorly delivered support rather than excess provision, and risks responding with cuts that leave students under-supported.
- **Free and built-in tools are not adequate substitutes for specialist assistive software.** 63.6% of survey respondents disagreed or strongly disagreed that free or built-in tools met their disability-related needs as effectively as paid assistive software. Panellists cautioned that free tools are frequently limited in functionality, unreliable over time, and insufficient to replace tailored, specialist provision.
- **Gaps in addressing equipment needs.** Panellists noted frequent cases where students are denied appropriate equipment under current DSA provisions, with some turning to the Snowdon Trust as a result. The proposed changes risk entrenching and extending these gaps.
- **The exceptional circumstances framework is deeply flawed.** The number of students requiring case-by-case exceptions under the proposed framework is likely to be substantially underestimated. Survey respondents reported their concerns that the framework risks producing inequity through a hierarchy of need, wherein some disabilities are treated as inherently more deserving of support than others.
- **The rationale for cuts on the basis of general student benefit is misconceived.** The appropriate test for DSA eligibility is whether a student would be significantly disadvantaged without support, not whether a tool could also benefit non-disabled students.
- **Placing greater responsibility on Higher Education Providers carries significant risk.** Institutional provision of assistive technology is demonstrably inconsistent. Precedent from the 2016-17 withdrawal of DSA accommodation funding suggests

that when statutory support is reduced on the assumption that universities will compensate, it is disabled students who bear the consequences.

The Snowdon Trust's overarching concern is that these proposals are primarily driven by cost-cutting rather than by evidence of student need, and that, if implemented, they risk reducing access to appropriate support for some of the most vulnerable students in higher education.

About Us

For over 40 years, the Snowdon Trust has removed barriers faced by disabled students in higher education so they can thrive academically, progress into meaningful careers and participate fully in society. We are the only UK charity focused exclusively on disabled students in higher education through a combined model of **financial support, leadership development and systems change**.

We work nationally, supporting more than 500 students and graduates each year. Our work is shaped by lived experience and grounded in a deep understanding of the structural barriers disabled students face.

Our evidence base

We distributed a survey to disabled student applicants to the Snowdon Trust's grant and scholarship programmes, inviting them to share their views on the proposed changes to assistive software funded through the Disabled Students' Allowance. The survey combined quantitative and open-ended questions inviting qualitative testimony on their personal experiences. We received 77 responses from students who indicated that they directly benefitted from DSA-funded assistive software during their studies, providing a substantial evidence base of lived experience to inform our response to this consultation. This evidence was supplemented by a discussion with our expert grant award panel who provided professional perspectives on the practical implications of the proposed changes.

Key concerns and recommendations

1. Over-recommendation and under-use of assistive technology

45% of respondents reported using most of the software recommended to them regularly. A further 29% said that they used some tools but found the number overwhelming.

- The consultation claims that in some cases, students are now being recommended so many different assistive software products through DSA that some find it overwhelming and end up not using assistive software at all.

- It is emphasised that “overwhelm” can be a particular issue for students with certain disabilities.
- The Snowdon Trust recognises that this can be the case, however, is concerned with the framing of the issue.
 - DSA support is not self-selected, it is the result of professional recommendations. If these lead to overly complex or poorly matched packages, this indicates **a need for stronger assessor guidance and better prioritisation of support** rather than a reduction in provision.
- Reducing the range or availability of assistive software is therefore a disproportionate response that risks under-provision, particularly for students with complex or multi-dimensional needs.
- Arguably, these changes propose **a serious risk of under-provision to students**, particularly those with complex or multi-dimensional needs. This risk must be considered proportionately against the financial burden of over-provision.
- **A more effective approach would focus on improving how support is assessed, introduced, and embedded**, ensuring that provision remains responsive and commensurate to individual need and is delivered in a structured and manageable way.

1.1. Inexperienced assessors and inconsistent assessments

The Snowdon Trust emphasises that both the over-recommendation and underuse of assistive technology reflect issues arising from inconsistent assessments and varying levels of assessor experience.

- Panellists raised concerns about the increasing number of inexperienced assessors within the new system.
- With recent changes limiting the equipment that can be routinely recommended, **assessors are now more often required to justify essential items under “exceptional circumstances.”**
- **However, less experienced assessors may lack the confidence, knowledge, or training to advocate effectively in these cases** or to challenge Student Finance England (SFE) decisions. As a result, necessary equipment may go unapproved, not because it is unwarranted, but because the process for securing it is more complex and difficult to navigate.

This highlights a key concern: while there may be a tendency in some cases to over-recommend standard equipment, the current system simultaneously creates barriers to securing more specialised or essential support, particularly when assessors are not equipped to navigate the “exceptional case” process.

“There’s a lot of new assessors... that don’t know how to push for things that SFE consider exceptional cases.”

- Panel member

1.2. Students need better preparation for needs assessments

The Snowdon Trust recommends that students receive greater onboarding and user support surrounding their DSA needs assessment.

- Panellists agreed that students often don’t know what they are entitled to or how to articulate their needs.
- This leads to under-assessment and later appeals or grant applications.

“Maybe students need to be more prepared going into the assessment so they know they can push for things.”

- Panel member

- Many students **lack clear guidance on how to navigate the DSA process**, understand their entitlements, or challenge decisions.

“I did not know there was help with this. I would have appreciated it.”

- Survey respondent

- Panellists emphasised that **clearer, nationally consistent information** would help ensure students receive appropriate support from the outset.

“In my honest opinion as a deaf student, the paid assistive software provided through DSA was quite archaic and old...None of the software provided through the DSA helped me with what I needed and I ended up using paid options through my uni or not using any at all to my detriment.”

- Survey respondent

1.3. Training, onboarding and evolving support needs

The Snowdon Trust emphasises that effective use of assistive technology depends not only on appropriate recommendations but on high-quality training, onboarding and ongoing support, which are insufficiently addressed in the consultation.

- Panellists noted that training for both mainstream ICT, built-in accessibility tools and specialist AT is vital, yet is rarely included in supplier reports or consistently recommended during assessments.
- Students frequently receive software without adequate instruction on how to use it, contributing to the perception of “overwhelm” and leading to under-use of tools that could otherwise be transformative.

“Training should be considered as well, if a student doesn't know how to use something they may never confidently use the software they are provided.”

- Survey respondent

- Many disabled students, particularly those with severe visual impairment (VI), require additional or refreshed training as course delivery changes (e.g., shifts between in-person teaching, online learning, or increased reliance on digital materials).
- Upgrades to specialist AT can require students to learn entirely new workflows, creating additional cognitive and time burdens that must be recognised within DSA support.
- Changes in a student’s circumstances, such as loss of residual vision or progression of a long-term condition, also necessitate re-assessment and further training, which may incur additional costs.
- Panellists highlighted that in-depth specialist assessments for “low-incidence, high-need” disabilities are not routinely provided, and recommended that assessors be encouraged to liaise with previous support providers (e.g., local authority VI services) who may have long-standing knowledge of the student’s needs.

“Training and familiarity are a real cost that this proposal ignores. Many students arrive at university already proficient in a particular product they have used for years through school. Forcing them onto a cheaper alternative discards that hard-won fluency and demands they relearn a core tool at the very point their workload is increasing. The time, stress and lost productivity that follow are a genuine cost, simply not one that appears on the procurement spreadsheet.”

- Survey respondent

These gaps in training and specialist assessment contribute significantly to the under-use of assistive technology and must be addressed if the proposed changes are to support, rather than undermine, disabled students' ability to engage fully with their studies.

2. Gaps in addressing equipment needs

2.1. Demanding software

The Snowdon Trust is concerned that the 'demanding software' distinction does not prioritise whether an equipment solution is genuinely effective

- The Snowdon Trust is concerned that this proposal introduces the same fundamental issue seen elsewhere in the consultation; **an over-reliance on theoretical suitability** rather than assessing whether a solution is genuinely effective in practice.
- The existence of a non-demanding alternative does not guarantee to meet the student's needs to an equivalent standard and setting this as a threshold **risks under-provision**.
- Panellists also emphasised that the proposal continues to disregard the interaction between assistive software requirements and the technical demands of a student's course.
- **Demanding assistive software can place significant strain on device performance**, particularly where courses already require higher-specification hardware. In these cases, students require devices capable of supporting both their academic requirements and assistive technologies simultaneously, yet funding constraints may mean that only one set of requirements can be adequately met.
- This introduces **a clear risk of inequity** where students may be unable to fully engage with their course despite support being in place. In some cases, students with chronic health conditions may also be provided with high-specification laptops that are too heavy to carry, leaving them unable to use the equipment they have been awarded.
- It also **narrows what is recognised as 'necessary' support**, with direct implications for students' eligibility for DSA-funded hardware.

"They end up with equipment that can't handle both... and nobody's willing to absorb the combined cost."

- Panel member

- A more appropriate approach would be to assess technical requirements holistically, ensuring that funded equipment can support the assistive technologies a student requires, meet the academic demands of their course, and be manageable for the student on campus, rather than treating these as separate or competing considerations.

2.2. Concern that SFE aims to reduce laptop provision

The Snowdon Trust recommends that hardware eligibility be assessed independently of software classification, to prevent indirect restrictions on access to DSA-funded laptops.

- Building on the concerns outlined above, without a holistic assessment of technical need, **many students may no longer be eligible for a DSA-funded laptop**, particularly where software is reclassified as “non-demanding” despite still requiring adequate device performance in practice.
- Several panellists expressed concern that **the consultation’s underlying aim may be cost reduction**, particularly through limiting laptop provision.
- If assistive software is reclassified as “non-demanding,” SFE may argue that students no longer require higher-specification devices.
- This would significantly reduce eligibility for DSA-funded computers, despite many disabled students needing devices capable of running both course-specific software and assistive technology effectively.
- As a result, this **creates a displacement of responsibility onto organisations like the Snowdon Trust**, as students who are no longer eligible for DSA-funded laptops seek alternative funding to meet essential study needs that should be covered through statutory support.

“Cynically, SFE may be doing this whole exercise to obviate the need for a computer, which is a considerable cost for them.”

- Panel member

“Since students are only eligible for a DSA-funded computer if they are awarded demanding software, narrowing demanding-software awards quietly narrows hardware awards too.”

- Survey respondent

2.3. Compatibility and cumulative demand of software

The Snowdon Trust recommends that DSA equipment eligibility assessments should consider device specifications against the cumulative technical demands of a student's full suite of assistive software.

- Beyond individual software demands, the panel also highlighted the **cumulative demands of multiple assistive tools running simultaneously**.
- Even if individual apps are “non-demanding,” their combined load can exceed a standard device’s capacity.

“It’s not just about having individual bits of apps... they might accumulatively create an increase in demand on the computer.”

- Panel member

“I think the question should be whether a software is the best fit or not, not whether it is ‘demanding’. The difference between a software that sort of works and one that does exactly what you need is huge!”

- Survey respondent

2.4. Students not receiving appropriate equipment through DSA

The Snowdon Trust recommends that the DSA assessment and awards process be reviewed to ensure students are consistently receiving the equipment they are entitled to.

- These risks are already evident under the current DSA provisions, with panellists noting frequent cases where students are denied equipment they should qualify for, leading them to seek support from Snowdon Trust instead.
- Examples included:
 - **Portable devices**, such as tablets, for students unable to carry heavy laptops.
 - **Specialist vision impairment equipment**.

“I had to replace my own laptop as it failed to work for what I needed.”

- Survey respondent

3. Overreliance on free or cheapest software options

The Snowdon Trust rejects the notion that free or built-in tools are sufficient, and recommends that all forms of assistive software remain a part of standard DSA provision.

- The consultation proposes a movement towards a policy position that assistive software is readily available to the student, and will therefore only be funded where there is an additional disability-related need for it that cannot be met by any other software available.
- This **shifts the focus away from what a student needs to what is assumed to be available to them**, raising concerns about fairness and equality
- The fact that software is “readily available” **does not mean it is accessible, appropriate, or effective** in addressing a specific disability-related barrier.
- The requirement that DSA only provides software where no “readily available” option exists to meet a student’s need sets a high threshold, **risking the exclusion of students whose needs are only partially met by the tools they already have access to.**
- In practice, this could lead to **under-provision**, with students expected to rely on tools that are not sufficient.
- A fairer approach would be to **assess whether available software adequately meets the student’s needs in practice**, rather than basing decisions on availability alone.

3.1. Free or built-in apps are unreliable substitutes

The Snowdon Trust recommends that the consultation’s assumption, that built-in and free tools are adequate substitutes for specialist assistive software, be reconsidered.

- 63.6% of respondents disagreed or strongly disagreed that free or built-in tools met their disability-related needs as effectively as paid assistive software.
- The consultation claims that many of the features provided in assistive software products have now been incorporated as standard into computer operating systems, internet browsers and so on.
- This means that some accessibility features are now widely available to all students using a computer in a way that they were not in the past.
- The Snowdon Trust acknowledges this, however, **the computer operating systems with the most advanced accessibility features tend to be the most expensive**, introducing a clear risk of inequity where students’ access to effective support is determined by their ability to afford higher-cost devices or platforms. **Thereby forcing a higher price tag on disabled students.**

- **Panellists also noted that so-called “free” tools are often limited to basic functionality**, with more advanced features requiring paid upgrades. This further entrenches inequity, as students without means to pay may only be able to access less effective support.
- In addition, free apps **may disappear or lose functionality over time**, exacerbating this inequity by creating inconsistent or unreliable support for those forced to rely on them.

“Apps just disappear... and that happens with assistive technology apps if they're not paid for versions.”

- Panel member

3.2. Free-app-first approach risks pushing students to charities

The Snowdon Trust recommends a reconsideration of the proposed free-app-first approach.

- The consultation suggests students can try free apps first and only return to DSA if these fail to meet their needs.
- Panellists warned that this approach risks leaving students without sufficient support where free tools do not meet their full needs, and may therefore push more students to the Snowdon Trust unnecessarily.
- There is clear recent evidence that the existing DSA process is difficult to navigate, slow and inconsistent, with **reports of months-long delays, extended waits for responses, and students beginning their courses without support in place** (Thomas Pocklington Trust, 2026; Wonkhe, 2024; Office for Students, 2025; Disability Rights UK, 2025; Disabled Students UK, 2025).
- Introducing a “free-app-first” pathway **risks creating a two-stage system on top of an already strained process**, adding duplication, delay and confusion, and making it more likely that students disengage and turn instead to charities such as the Snowdon Trust.

“There’s going to be lots of people told ‘use a free app’ and then they’ll come to the Snowdon Trust... rather than go back to DSA if it’s not working.”

- Panel member

3.3. Risk that SFE will always choose the cheapest option

The Snowdon Trust recommends that final decisions on which software to fund remain with qualified needs assessors rather than defaulting to the lowest-cost

quote, with cost considered as one factor among several rather than the determining one.

- The consultation suggests that needs assessors must provide multiple quotes and SFE will select the cheapest.
- Panellists warned this undermines professional judgement.

“There are many reasons why I will recommend one piece of software over another... if that decision making is no longer down to assessors... they could end up spending money on something that won’t be used.”

- Panel member

“I am so thankful to my DSA assessors who listened to my specific difficulties and were able to carefully assess my case and make insightful suggestions about what software would work best based on this. Their suggestions for specific software and specific ways to work have been transformative, and I don't think this would have been the case if I had been given the lowest cost alternatives.”

- Survey respondent

3.4. Composition and mind-mapping software

The Snowdon Trust recommends that composition and mind-mapping software remain within standard DSA provision, with individual assessment determining which product best meets a student's needs.

- 64% of our respondents used composition and mind-mapping software during their studies. Of these, 84% reported that paid software was necessary.
- The consultation proposes that free-to-access composition tools should be suitable for the needs of the vast majority of students who need support with composition and mind-mapping.
- **Particularly for students with neurodivergent profiles, ADHD or dyslexia, these tools are not supplementary aids but essential scaffolding for academic work.**
- Several respondents say they only discovered the software was useful because DSA provided it; they wouldn't have sought it out or known to ask themselves. Narrowing eligibility removes this discovery function.
- Several Master's/PhD respondents emphasised that **at higher levels of study, specialist tools (MindView specifically) become integral to thesis-level structuring** in ways general office software does not replicate.

"I am a visual learner but cannot physically write so having a software option was a lifeline."

- Survey respondent

3.5. Note-taking, recording and captioning software

The Snowdon Trust recommends that the full suite of note-taking, recording and captioning tools be retained within standard DSA provision. Proposals that disaggregate these tools misunderstand how they are used in practice.

- 78% of our respondents used note-taking, recording or captioning software. Of these, 87% reported that paid software was necessary.
- The consultation proposes that no change be made to the provision of recording software, but that note-taking and captioning software be awarded only in exceptional circumstances, since free or built-in tools are likely to be suitable for the needs of the vast majority of students.
- **The Snowdon Trust is concerned that the proposal's logic is internally incoherent: respondents consistently emphasised that a recording is only valuable because note-taking and captioning render it navigable.**

"Keeping one while withdrawing the others leaves disabled students with half a solution and expects us to be grateful for it."

- Survey respondent

- Several respondents tested free alternatives (Google Live Transcribe, built-in captions) and found them inaccurate, particularly with technical vocabulary, accents, or poor audio quality.
- **Paid note-taking and captioning software is described as transformative and irreplaceable.**

"I use Genio & it has been lifechanging. I wasn't able to attend lectures before because they were so tiring as I couldn't process what was being said and write it down at the same time. I've attended almost every lecture since getting Genio & being able to read back over what my lectures have said is incredibly helpful."

- Survey respondent

- Additionally, respondents report that **many HEPs already provide lecture recordings, but that they do not provide captioning or note-taking;** the proposal does not address this gap in provision.

“If only recording software is provided, many students will have to spend countless hours making their own notes, which may be extremely difficult due to pain, fatigue, concentration or processing issues.”

- Survey respondent

3.6. Time and task management software

The Snowdon Trust recommends that time and task management software remain within standard DSA provision where assessed as necessary, recognising that for many disabled students this software functions as a direct compensatory tool for impaired executive functions.

- 42% of respondents used time and task management software. Of these, 69% reported that paid software was necessary.
- The consultation concludes that the free to access time and task management products provide similar functionality to the paid-for products with regard to organisation, emphasising that the additional functions of the paid-for products fall outside of the scope of DSA.
- Survey respondents emphasised that, **particularly for ADHD and autistic students, difficulties with time perception, prospective memory, task initiation and sequencing mean that this software functions as a disability-specific necessity.**
- Therefore, many respondents report that free or built-in software cannot substitute for paid, specialist software.

“Generic calendars assume the user reliably checks and acts on them, which is the very function that is impaired.”

- Survey respondent

3.7. Typing tutor software

The Snowdon Trust recommends that typing tutor software continue to be funded through DSA where assessed as necessary.

- 16 out of 77 respondents used typing tutor software during their studies. Of these, 13 (81%) reported that paid software was necessary.
- The consultation finds that there are free to access typing tutor tools available with the required functionality.
- **Compared to other categories, a high proportion of respondents did not use this software. However, views are strongly held among those who did,**

suggesting this is a category where need is concentrated in specific groups rather than widespread.

- One group identified by the survey which benefits from paid typing tutor is blind and visually impaired students.
- **Multiple respondents argue that for blind and visually impaired students, touch-typing is essential for academic work and independence.**
- Respondents distinguish between generic free typing tools (useful for sighted students) and paid audio-led typing tutors designed for blind users, which are described as indispensable.

“For a blind or severely visually impaired student, touch-typing is not an optional ‘useful skill’ — it is the literal foundation of computer literacy and digital survival in higher education.”

- Survey respondent

4. Exceptional circumstances

The Snowdon Trust recommends a careful reconsideration of the ‘exceptional circumstances’ framework.

- The consultation notes that for a number of the proposed changes, they will need to make exceptions on a case-by-case basis for a small number of students.
- **The Snowdon Trust expresses concern that there is likely to be a significant underestimation of the number of students who will require case-by-case exceptions.**
- In our experience as a grant-giving charity supporting disabled students, **individual circumstances are often complex, intersecting and not easily captured within standardised eligibility criteria.**

“I hate the term exceptional circumstances because everyone is so different and defining a set of conditions often makes it too hard for people to prove they need help.”

- Survey respondent

- If the exceptional circumstances framework is retained, the Snowdon Trust recommends it be available for a wide range of situations, including (but not limited to):

- Students with fluctuating or progressive conditions whose needs change over time
- Students facing multiple or intersecting disadvantages (e.g. disability combined with caring responsibilities or unsafe housing)
- Students requiring disability-related support that is not consistently or adequately delivered by their institution, including where responsibility has been shifted from DSA to HEPs without sufficient funding or accountability.
- Cases where delays or failures in institutional provision place students at risk of disengagement or withdrawal
- Situations involving significant additional costs that are clearly disability-related but fall outside standard funding mechanisms

5. Equality impact assessment

While targeted support for specific groups is accepted, the Snowdon Trust issues a strong challenge to the consultation’s implication that some disabilities require inherently less or different levels of support.

- The exceptional circumstances framework risks the unequal treatment of disabilities.

“I shouldn't have to prove I'm disabled enough to deserve help.”
 - Survey respondent

5.1. Speech-to-text software

The Snowdon Trust recommends that eligibility for speech-to-text software be based on a holistic assessment of disability-related need, rather than restricted to students who rely on it as their primary method of written communication and computer control.

- 74% of respondents used speech-to-text software during their studies. Of these, 84% reported that paid software was necessary.
- The consultation proposes that, other than in exceptional circumstances, DSA will only fund speech-to-text software for students who rely on speech recognition as their primary method of written communication and of controlling a computer.
- **Survey respondents emphasised that ‘primary method’ is the wrong approach, since speech-to-text software is used selectively/situationally by most disabled students.**

- Multiple respondents say that speech-to-text would not be considered their primary method of written communication, but that it is nonetheless essential.
- Particularly, for students with fluctuating and variable conditions, need for speech-to-text software varies day to day or even within a single day. A diagnostic snapshot assessment cannot capture this.

“I would be upset if DSA only allowed speech to text for students who use it as their primary method of communication. What about disabled students who only need it when in pain, exhaustion, flare ups or times when typing is hard for them?”

- Survey respondent

- As with other categories, **respondents emphasise that free dictation (including Word's built-in feature) is inaccurate, doesn't adapt to individual speech patterns or technical vocabulary, and results in more work (re-typing/correcting errors) than it saves.**
- The Snowdon Trust also received testimony from a medical professional whose career trajectory was transformed by DSA-funded speech-to-text software during their studies.

“It has opened up a whole new way of working as a doctor which has allowed me to climb to the top despite my disability and contribute to the general health of the population.”

- Survey respondent

5.2. Text-to-speech software

The Snowdon Trust recommends that the proposed diagnostic restrictions on text-to-speech provision be removed, and that eligibility instead be determined by individual functional need.

- 62% of respondents used text-to-speech software during their studies. Of these, 92% reported that paid software was necessary.
- The consultation proposes funding text-to-speech software will not be offered to students in the following categories unless exceptional circumstances apply:
 - Students with dyslexia
 - Students with ADHD
 - Students with autism
 - Students with mental health conditions
 - Students who are Mac users (as Macs have advanced in-built text-to-speech software)

- Under this proposal, DSA will continue to fund text-to-speech software for students with a vision impairment.
- **The Snowdon Trust is concerned that this diagnostic restriction is not led by an evidence-based approach.**
- Many respondents emphasised that **the functional need for this software (inability to decode or sustain attention to extended text) is the same for students with dyslexia/ADHD/autism/mental health conditions as it is for visually impaired students.**

“I have autism and struggle with large paragraphs and focus, if I did not have access to a text-to-speech software, I wouldn’t be able to do any research.”

- Survey respondent

- Of the 44 respondents who identified themselves as having one or more of the disabilities that would be excluded, but who did not have a visual impairment, 29 (64%) used text-to-speech software. Of these, 25 (86%) reported that paid software was necessary.
- **This is a significant proportion and directly contradicts the premise that this group can manage with free alternatives.**

“Depression can also trigger crisis periods where you can’t get out of bed and have a hard time functioning, being able to listen to texts audibly is necessary.”

- Survey respondent

6. The scope of DSA

The Snowdon Trust recommends that the appropriate test for DSA eligibility should remain whether a student would be significantly disadvantaged without the support, rather than whether the tool could also be of use to non-disabled students.

- The consultation argues that there has been an increasing blurring of boundaries when it comes to DSA funding between software that any student might require (which is generally out of scope of DSA) and software that is meeting a specific disability-related need (which is generally within scope of DSA). This has resulted in some types of software being awarded through DSA which “we do not believe are in line with the core principles of DSA funding.”

- **The Snowdon Trust finds this claim to be misleading because it conflates “general usefulness” with “functional necessity.”** Many tools that are now widely available are used as optional enhancements by most students but function as essential access mechanisms for disabled students with specific needs. Their wider availability does not justify withdrawing funding where they are required for equitable access.
- **If the purpose of DSA is to remove barriers to participation, whether a tool could benefit other students is irrelevant.** What matters is whether, without that support, a disabled student would be significantly disadvantaged or unable to engage with their studies on an equal basis.

“The atmosphere in general is already relatively unaccommodating to the needs of disabled students, and only around 20% of disabled individuals actually get degrees. The decline in access to software and technology would only further reduce this and create a more unfair, inaccessible education system.”

- Survey respondent

6.1. Presentation support software

The Snowdon Trust recommends that presentation software remain available within DSA provision where an assessed need is identified, with individual assessment determining appropriate provision.

- 27 out of 77 respondents (35%) used presentation support software during their studies. Of these, 17 (63%) reported that paid software was necessary.
- The consultation determines that any student may find presentation support software helpful and it is therefore outside the scope of DSA.
- Withdrawal risks adversely affecting disabled students at less-resourced HEPs.

“Giving presentations can be incredibly stressful for students who experience health conditions, pain, fatigue, anxiety, problems concentrating or focusing or students who have communication differences.”

- Survey respondent

6.2. Research and referencing software

The Snowdon Trust recommends that research and referencing software remain available within DSA provision where an assessed need is identified, with individual assessment determining appropriate provision.

- 48 out of 77 respondents (62%) used research and referencing software. Responses here were more divided than for other categories: 25 respondents (52%) found free or built-in tools sufficient, while 23 (48%) required paid software.
- The consultation determines that research and referencing software is widely used by students regardless of whether or not they have a disability, and that there is not generally a specific disability-related need for this software.
- A significant number of respondents said that they found free tools, such as Zotero, to be sufficient for their needs. However, they also highlighted the practical limits of these tools.
- **Storage limits for free versions, difficulty categorising sources, and inconsistent accuracy with names/dates/authors are repeatedly flagged as practical limitations**, and several respondents note that postgraduate/doctoral-level research pushes well beyond what free tools can handle.

“For postgraduate and doctoral research, managing thousands of footnotes, cross-references, and multi-jurisdictional bibliographies is an immense task. While sighted students can visually scan a page to quickly verify citation formatting, a blind student must rely entirely on assistive software to parse every line of text. Premium, paid referencing tools that integrate flawlessly with screen readers are not a luxury.”

- Survey respondent

6.3. Revision software

The Snowdon Trust recommends that revision software remain available within DSA provision where an assessed need is identified, with individual assessment determining appropriate provision.

- 55 out of 77 respondents (71%) did not use revision software during their studies. However, of the 17 who did, 15 (88%) reported that paid software was necessary.
- The consultation determines that any student might find revision software helpful and therefore it does not fall within the scope of DSA.
- **Revision and exam preparation represent the point of highest cognitive demand for neurodivergent students**, precisely because conventional revision methods often do not work for the way they process and retain information.

“Forcing students to jump through bureaucratic hoops to access exam preparation tools will directly damage their academic performance and increase unnecessary exam anxiety.”

- Survey Respondent

7. Higher Education Providers

The Snowdon Trust recommends that significant caution be exercised before placing greater responsibility for assistive software provision on Higher Education Providers, given that institutional delivery is demonstrably inconsistent.

- The consultation argues that the learning technologies many HEPs now provide to all students as part of inclusive learning and teaching approaches have lessened the need for separate standalone software products.
- The Snowdon Trust supports the principle of inclusive learning and teaching, but is concerned that provision varies considerably between institutions, and in some cases within institutions across different departments and courses.
- This is reflected in the responses to our survey. **Some respondents emphasised the invaluable support provided by their HEP, whilst others expressed frustration with the lack of support available.**

“I was only given Glean by my university who seemed reluctant to fund it at first and it was a delayed process to get it!”

- Survey respondent

“I am lucky my institution was excellent and continually supported me.”

- Survey respondent

- Our wider work shows that institutional provision does not always work effectively in practice.
 - In a previous policy decision from the 2016-17 academic year, DSA largely withdrew from funding additional accommodation costs on the basis that universities would meet these needs.
 - **Our data shows that this shift has not worked as intended. Each year, a notable proportion of applications to the Snowdon Trust relate to accessible accommodation (12% in 2025; 11% in 2024; 18% in 2023).**
 - Most of these cases fall within the expected remit of universities, yet many students do not receive adequate provision.
 - In 2024, over half (52%) of Snowdon Trust requests that should have been met by institutions were refused or only partially supported, forcing students to seek charitable funding.
- In practice, we observe that:
 - Universities do not consistently deliver support
 - Charities are unable meet demand

- Students are left with unmet need or additional costs
- **We are concerned that the proposed changes to assistive technology provision will replicate these issues.** As in the case of accommodation, responsibility is being shifted towards HEPs, increasing the likelihood that a far greater number of students will need to rely on “exceptional circumstances” in order to access appropriate support.
- Crucially, **without clear funding, delivery mechanisms or accountability, there is significant risk that this support will not materialise in practice.** When provision fails in this way, responsibility is not absorbed by institutions but falls directly on disabled students.
- For this reason, **“exceptional circumstances” must explicitly include cases institutional provision has not been delivered, has been delayed, or is only partially in place,** leaving students without adequate support.

8. Artificial intelligence

The Snowdon Trust expresses concerns about a shift towards AI-dependent provision replacing specialist assistive software.

- While not an area of technical specialism, **there are recognised risks around data protection, confidentiality and jurisdiction when using free or low-cost AI tools.**
- Multiple survey respondents strongly warn against AI as a substitute, citing **plagiarism risk and confidentiality concerns.**

“The predictable behavioural consequence is that students who lose formal tools increase reliance on AI for cognitive support in an environment where that use is ambiguous at best and sanctionable at worst, leaving them with neither a funded tool nor a safe alternative.”

- Survey respondent

- Insights from the Trust’s wider programmes also highlight practical challenges in implementation.
- Even where support is approved, disabled students can sometimes face resistance from individual academics who question its necessity, fail to implement or perceive it as an unfair advantage.
- **In the current context, where institutions are actively seeking to restrict AI use, this creates a risk that disabled students using AI-based assistive tools may face increased scrutiny or challenge.**

"Free software is often AI-based, which is a problem with confidential research."

- Survey respondent

- Overall, this suggests that **any move towards greater reliance on AI should be approached cautiously**, ensuring that data security, clarity of use, and academic acceptance are addressed alongside cost considerations.

Snowdon Trust Grant Panel

- Nigel Utting (Chair), Former DSA Consultant Needs Assessor, Integrative Counsellor
- Paolo Dasgupta, Senior Associate, Financial Conduct Authority, former Snowdon Trust grant awardee
- Clare Graham, DSA Assessor
- Hannah James, Customer Experience manager, RNIB
- Alison Lambert, Disability and Mental Health Advisor, Kingston University, DSA Assessor
- John Rous Milligan, former Sensory Support (visual impairment) Service Manager
- Kate Pilkington, Communication Support for Deaf and Deafblind people, volunteer at Citizens Advice Bureau
- Sarah Smart, Head of Student Journey at the University of Law

Appendix - Survey data (full survey data available upon request.)

Quantitative data

Key: software usage codes (columns 7–15):

P	Paid software was necessary
F	Free / built-in tools were sufficient
N	Did not use this software
–	No response / ambiguous

Key: 'Free tools sufficient?' colour scale:

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

Disability category abbreviations:

SpLD = Specific learning difference (dyslexia dyspraxia/ ADHD) | **MH** = Mental health condition | **ASC** = Autistic spectrum condition | **VI** = Visual impairment | **HI** = Hearing impairment | **Physical** = Physical impairment/ mobility/dexterity | **LTC** = Long-term illness/health condition

ID	Status	Disability categories	Overall software uptake	Free tools sufficient?	Demanding software	Comp & mind-map	Note-taking & caption	Pres. support	Research & referencing	Revision	Speech-to-text	Text-to-speech	Time & task mgmt	Typing tutor
1	Other	SpLD, MH, ASC	Not applicable	Neither	–	N	N	N	N	N	N	N	N	N
2	Current student	SpLD	Most	Agree	Yes	P	P	P	P	P	P	P	P	P
3	Recent graduate	SpLD, Physical, MH	Most	Disagree	No	P	P	P	P	P	P	N	P	N
4	Current student	SpLD, ASC, LTC	Most	Strongly disagree	No	N	N	N	P	N	P	P	N	N
5	Recent graduate	MH, ASC	Not applicable	Neither	No	N	N	F	F	N	N	N	N	N
6	Recent graduate	ASC, MH	Most	Strongly disagree	No	P	P	P	P	N	P	P	N	N
7	Recent graduate	SpLD	Most	Strongly agree	Yes	P	P	P	P	P	P	P	P	P
8	Current student	SpLD, Physical, ASC, LTC, MH	Most	Strongly disagree	Yes	N	P	N	F	N	P	P	F	N
9	Recent graduate	SpLD, Physical, LTC, MH	Other	Strongly disagree	No	P	P	N	F	N	P	N	N	N
10	Current student	SpLD, LTC, MH	Most	Strongly agree	No	F	N	F	F	F	N	F	F	N
11	Recent graduate	SpLD, Physical, ASC, LTC, MH	Some	Disagree	No	F	P	N	F	N	P	N	N	N

1 2	Rece nt gradu ate	VI, Physica l, LTC	Most	Strongl y disagre e	Yes	P	P	N	N	–	P	P	P	P
1 3	Curre nt stude nt	HI, Physica l, LTC, MH	Some	Agree	Yes	N	F	N	F	N	P	F	N	N
1 4	Rece nt gradu ate	SpLD, Physica l, ASC, LTC	Most	Strongl y agree	No	P	P	P	N	–	P	P	–	N
1 5	Other	Physica l, LTC	Not applica ble	Strongl y agree	No	N	N	N	N	N	N	N	N	N
1 6	Rece nt gradu ate	LTC	Other	Strongl y agree	Yes	P	P	P	P	P	P	P	P	P
1 7	Rece nt gradu ate	SpLD	Little	Agree	Yes	P	P	N	F	N	P	N	N	N
1 8	Curre nt stude nt	SpLD, ASC	Most	Disagre e	Yes	P	P	P	P	N	P	P	P	N
1 9	Curre nt stude nt	SpLD, ASC, LTC	Some	Strongl y disagre e	No	P	P	N	P	N	N	N	N	N
2 0	Curre nt stude nt	MH	Some	Disagre e	No	F	N	N	F	N	N	N	F	N
2 1	Curre nt stude nt	SpLD, ASC	Some	Neither	No	F	F	N	F	N	F	F	F	N
2 2	Curre nt stude nt	Physica l	Some	Strongl y disagre e	No	N	P	N	F	N	P	P	N	N
2 3	Curre nt stude nt	SpLD, ASC, LTC	Most	Disagre e	No	P	P	N	N	N	N	P	N	N
2 4	Rece nt gradu ate	LTC	Not applica ble	Disagre e	No	N	P	N	F	P	P	P	N	–

25	Recent graduate	Physical, LTC, MH	Some	Strongly disagree	No	P	P	N	F	N	N	N	F	N
26	Current student	ASC, LTC	Most	Strongly disagree	–	–	P	–	–	–	P	P	–	–
27	Current student	HI	Little	Disagree	No	P	P	N	N	N	P	F	N	N
28	Current student	SpLD, HI, Physical, ASC, LTC, MH	Other	Strongly disagree	Yes	F	F	N	N	N	N	P	N	N
29	Current student	SpLD, VI, Physical, ASC, LTC	Some	Neither	No	P	P	N	P	N	P	P	–	–
30	Recent graduate	SpLD, Physical, LTC, MH	Some	Strongly agree	No	F	P	F	F	N	F	P	P	N
31	Recent graduate	VI, SpLD	Other	Strongly disagree	Yes	N	P	N	N	N	P	N	N	N
32	Recent graduate	Physical	Little	Strongly agree	No	N	P	N	N	N	F	N	N	N
33	Current student	SpLD, Physical, ASC, LTC, MH	Most	Disagree	Yes	P	P	N	N	N	P	P	N	N
34	Recent graduate	SpLD, ASC, MH	Most	Strongly disagree	Yes	P	P	P	P	P	P	P	P	P
35	Current student	ASC, MH, LTC, HI, Physical, VI	Some	Disagree	Yes	P	F	F	F	N	P	P	N	N
36	Current student	SpLD, MH	Most	Strongly agree	Yes	P	P	P	P	N	P	P	P	N

37	Recent graduate	Physical	Not applicable	Neither	No	N	N	N	N	N	N	N	N	N
38	Recent graduate	VI	Not applicable	Neither	No	N	N	N	N	N	P	P	N	N
39	Current student	VI, HI, Physical, ASC, LTC, MH	Most	Strongly disagree	Yes	P	P	P	F	P	P	P	P	F
40	Recent graduate	SpLD, Physical, LTC, MH	Most	Strongly disagree	–	–	–	–	N	N	P	P	N	N
41	Recent graduate	SpLD, Physical, ASC, MH, LTC	Most	Strongly disagree	Yes	P	P	F	F	P	P	P	P	N
42	Current student	SpLD	Other	Strongly disagree	Yes	P	P	P	P	P	P	P	P	P
43	Current student	SpLD, Physical, ASC, LTC	Most	Strongly disagree	No	P	P	P	P	P	P	P	P	N
44	Current student	SpLD, Physical, ASC, LTC	Some	Strongly disagree	Yes	N	N	N	N	N	P	N	N	N
45	Other	Physical, LTC, MH	Other	Strongly agree	No	N	N	F	N	N	N	N	N	N
46	Recent graduate	HI, ASC, MH	Not applicable	Agree	Yes	F	F	F	F	F	P	P	P	P
47	Recent graduate	HI, ASC, MH	Some	Agree	Yes	P	P	P	P	P	P	P	P	P
48	Recent graduate	SpLD, ASC, LTC, MH	Most	Disagree	Yes	P	P	P	P	–	P	P	P	P
49	Current student	SpLD, LTC, Physical	Some	Strongly agree	Yes	F	F	F	N	N	F	F	N	F

50	Current student	ASC, Physical, LTC, MH	Most	Strongly disagree	No	P	P	N	N	N	N	P	N	N
51	Recent graduate	HI, ASC, MH	Some	Agree	Yes	P	P	N	F	N	P	P	F	N
52	Recent graduate	SpLD	Most	Strongly disagree	Yes	P	P	N	F	–	P	P	–	–
53	Recent graduate	SpLD	Most	Strongly disagree	Yes	P	P	N	N	P	F	P	N	P
54	Recent graduate	SpLD	Most	Strongly disagree	No	P	P	N	N	N	P	P	N	N
55	Current student	Physical, LTC	Most	Strongly disagree	Yes	N	P	N	N	N	–	P	N	N
56	Current student	SpLD	Some	Agree	No	N	P	F	F	P	P	P	–	P
57	Recent graduate	Physical, LTC	Most	Strongly disagree	No	P	P	N	F	N	P	P	P	N
58	Current student	Physical, SpLD, ASC, HI, LTC, MH	Most	Strongly disagree	Yes	P	P	P	P	N	P	P	P	N
59	Other	LTC	Most	Disagree	Yes	N	P	N	N	N	N	N	N	N
60	Current student	SpLD, ASC, MH	Some	Disagree	No	P	P	N	P	N	F	N	N	N
61	Current student	LTC, SpLD	Some	Disagree	No	N	P	N	N	N	F	P	F	N
62	Recent graduate	HI	Some	Strongly agree	No	N	F	N	N	N	N	N	N	N

63	Current student	VI, Physical, LTC, MH	Most	Strongly disagree	Yes	N	N	N	F	N	F	P	P	N
64	Current student	Physical, ASC, LTC	Little	Agree	–	P	N	N	N	N	P	N	N	N
65	Current student	Physical, ASC, LTC, MH	Some	Disagree	No	P	P	P	P	P	N	P	P	N
66	Current student	ASC, Physical, LTC, MH	Other	Disagree	Yes	N	F	N	F	N	P	P	N	N
67	Recent graduate	SpLD, LTC, MH	Some	Neither	Yes	P	P	N	F	N	P	P	N	N
68	Other	VI	Most	Strongly disagree	Yes	N	P	P	P	N	P	P	N	P
69	Recent graduate	ASC	Some	Disagree	Yes	F	N	N	N	N	P	N	N	N
70	Current student	HI, SpLD, MH	Other	Neither	Yes	P	P	N	P	N	N	–	N	N
71	Current student	SpLD, Physical, ASC, LTC	Little	Disagree	No	N	P	N	P	N	N	P	F	N
72	Current student	Physical, ASC, LTC, MH	Most	Agree	Yes	P	P	N	P	–	P	P	P	–
73	Current student	SpLD, LTC, Physical	Most	Strongly disagree	Yes	P	P	F	F	N	P	P	F	N
74	Other	SpLD, LTC	Most	Strongly disagree	–	P	P	N	P	N	P	N	N	N
75	Other	SpLD, VI, Physical, ASC,	Some	Strongly disagree	Yes	N	N	N	N	N	P	N	F	N

		LTC, MH												
7 6	Recent graduate	VI	Most	Strongly disagree	Yes	N	N	N	N	N	N	N	N	N
7 7	Current student	Physical, ASC, LTC, MH	Most	Disagree	No	P	N	N	N	N	N	N	N	N