Equalities Impact Assessment for the removal of spelling & grammar software from DSA funding other than in exceptional circumstances

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Part 1: Introduction

This document records the analysis undertaken by the Department for Education to enable Ministers to fulfil the requirements placed on them by the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010.

The PSED requires the Minister to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

These aims are also known as the three limbs of the PSED.

Part 2: Brief outline of policy or service

Assistive software has been funded through DSA for many years to assist disabled students in accessing their studies.

In recent years software products such as Microsoft Office (which can be accessed for free by any student with a ".ac.uk" email address) and operating systems such as Windows have significantly improved the accessibility features that they offer and continue to do so. These include features such as grammar / spelling checkers which have some overlap with standalone software products that have historically been funded by DSA. It is also increasingly the case that free software products for spelling and grammar are offering similar functionality to the paid-for products.

Given these developments, we have conducted a detailed review of the spelling and grammar functionality available in Microsoft Office, computer operating systems, free software products and paid-for software products. This review concluded that the spelling and grammar functionality available in products that students can access for free was similar to that available in paid-for products. While some of the paid-for products had additional features such as plagiarism checkers, these are not in scope for DSA funding, given they are of potential benefit to all students. It is not an

effective use of public money to fund paid-for software when there are free versions available that would meet students' needs. We are therefore proposing not to fund basic spelling and grammar software through DSA other than in exceptional circumstances. We will, however, continue to fund specialist spelling and grammar software (e.g. for medicine) where a robust disability-related justification is provided, as currently.

Part 3: Analysis of impacts

Sex

Table 1: undergraduate DSA recipients by sex

Sex	% sex split of all undergraduate students	% sex split of all undergraduate students known to be in receipt of DSA
Male	42.4%	31.6%
Female	57.6%	68.4%
Other	0%	0%
Total	100%	100%

Table 2: postgraduate DSA recipients by sex

Sex	% sex split of all postgraduate students	% sex split of all postgraduate students known to be in receipt of DSA
Male	36.2%	27.8%
Female	63.8%	72.2%
Other	0%	0%
Total	100%	100%

Ethnicity

Table 3: undergraduate DSA recipients by ethnicity

Ethnicity group	% ethnicity split of all undergraduate students	% ethnicity split of all undergraduate students known to be in receipt of DSA
White	67.4%	74.1%
Asian	15.1%	8.6%
Black	9.7%	9%
Other (including mixed)	7.9%	8.3%
Total	100%	100%

Table 4: postgraduate DSA recipients by ethnicity

Ethnicity group % ethnicity split of all postgraduate students		% ethnicity split of all postgraduate students known to be in receipt of DSA	
White	70.9%	73.2%	

Black	9.1%	11%
Other (including mixed)	6.9%	7.9%
Total	100%	100%

Age

Table 5: undergraduate DSA recipients by age

Age group	% age split of all undergraduate students	% age split of all undergraduate students known to be in receipt of DSA
20 years and under	51.4%	46.5%
21 - 24 years	21.6%	29.2%
25 - 29 years	7.9%	8.4%
30 years and over	19.2%	15.8%
Total	100%	100%

Table 6: postgraduate DSA recipients by age

Age group	% age split of all postgraduate students	% age split of all postgraduate students known to be in receipt of DSA
20 years and under	0.2%	0%
21 - 24 years	26.1%	32%
25 - 29 years	21.9%	24.3%
30 years and over	51.8%	43.7%
Total	100%	100%

^{*}Analysis based on data from the Higher Education Statistics Agency (HESA) on English-domiciled students at UK higher education providers in the 2022/23 academic year. Note that the percentages refer to cases where the characteristics are known (i.e. "not known" has been excluded).

3a. Summary Table

	Impact			
Protected Characteristic	Limb 1 – eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act	Limb 2 – advance equality of opportunity between people who share a protected characteristic and those who do not	Limb 3 – foster good relations between people who share a protected characteristic and those who do not	Other impacts/ intersectional analysis
Age	Neutral	Neutral	Neutral	Neutral

Disability	Neutral	Neutral/Negative	Neutral	Neutral
Gender	Neutral	Neutral	Neutral	Neutral
Reassignment				
Marriage &	Neutral	N/A	N/A	Neutral
Civil				
Partnership				
Pregnancy&	Neutral	Neutral	Neutral	Neutral
Maternity				
Race	Neutral	Neutral	Neutral	Neutral
Religion or	Neutral	Neutral	Neutral	Neutral
belief				
Sex	Neutral	Neutral	Neutral	Neutral
Sexual	Neutral	Neutral	Neutral	Neutral
orientation				

3b. Further detail

Disability – Neutral/Negative

We have identified possible impacts under limb 2 of the PSED, as set out below:

There is a risk that our proposal may have a negative impact on some disabled students who might prefer paid-for spelling and grammar software, such as Grammarly for Education. However, this impact will be mitigated by the availability of free versions of spelling and grammar software that provide equivalent functionality for the types of support that are in scope of DSA.

This impact will also be mitigated by the fact that DSA will still fund paid-for spelling and grammar software in exceptional circumstances where a robust disability-related justification is provided.

This impact will also be mitigated by the fact that AT training on all spelling and grammar software, (free or paid for) will continue to be provided to students through DSA, where required.

Our overall assessment, therefore, is that the negative impact on students with the protected characteristic of disability as a result of this policy change will be minimal.

Part 4. Decision making

Our overall decision is that basic spelling and grammar software be removed from DSA funding, other than in exceptional circumstances. As discussed above, our assessment is that the negative impact on disabled students as a result of this policy change will be minimal.

This decision will ensure that DSA funds are being spent appropriately and in line with Managing Public Money guidance.

Part 5. Monitoring evaluation and action plan

We will monitor the impact of this change by seeking regular feedback from interested parties such as SLC, the contracted DSA suppliers, and stakeholders across the DSA and HEP sectors, as well as seeking ways to gather direct feedback from students. We will also consider information on the recommendations made for spelling and grammar software and any exceptional circumstances cases that are recommended and agreed.

We will use this information to consider whether any changes should be made to this policy in the future.