EVIDENCE SYNTHESIS

The Case for an Assistive Technology Library Model

Investing in Libraries as National AT Infrastructure

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Evidence base: 12 FOI responses, documented CRM system failures, frontline case studies, NAO Report HC 1644 (February 2026), and 7+ years of AT training delivery records

Executive Overview

This document collates frontline evidence from an Assistive Technology trainer operating within the UK's Disabled Students' Allowance (DSA) and Access to Work (AtW) ecosystems. It synthesises operational experience, documented system failures, Freedom of Information responses, and observed inefficiencies into a structured argument for fundamental reform.

When policy is created in rooms where there is limited experience of implementation, the natural focus falls on figures and data in ways that avoid operational reality. When policymakers have little experience of the strengths within the system they administer, they focus on what they perceive as challenges, because they do not question the infrastructure that was created to address the issue.

The core thesis is straightforward: the current model of disability support technology provision is built on 20th-century medical model thinking. It diagnoses the individual, prescribes a solution, and funds it through a labyrinthine bureaucracy. The result is a system that is slower, more expensive, and less effective than a modern, infrastructure-based approach would be. A hidden bias within both processes assumes that checks and balances are the only way to deliver a service. The tone and tactic are to blame the people who are applying rather than review the system. As this report reveals, the processes built into the system have increased in time, and the costs charged by outside suppliers with most to gain from those processes have increased alongside them, with contracts that measure neither outcomes nor value for money.

The alternative proposed here is the AT Library Model. It treats assistive technology the way we treat books in a public library: available to anyone who needs it, without requiring a diagnosis, an assessment, a multi-month application, and a five-tier contracting chain to access it.

The evidence base is substantial and verifiable. Twelve Freedom of Information requests to government bodies, universities, and public agencies have revealed systemic governance failures across the DSA and Access to Work supply chain. A documented case study of CRM system failures shows a 29.7% data loss rate in the technology stack used to deliver DSA training. The February 2026 National Audit Office report (HC 1644) confirms that Access to Work processing times have increased by 289%, the decision backlog has grown by 186%, and outstanding payments have risen by 359%, even as staffing has doubled.

This document is structured in eight sections, reflecting the progression from problem identification through to proposed solution. Governance evidence is woven throughout rather than siloed, because the governance failures are not separate from the operational failures. They cause them.

A Note on Language

This report uses identity-first language throughout, following the preferences expressed by the communities it describes. ‘Autistic person’ rather than ‘person with autism.’ ‘Disabled student’ rather than ‘student with a disability.’ This follows the Social Model of Disability: the person is disabled by the barriers in their environment, not by their condition. The language reflects that.

The term ‘neurodivergent’ is used to describe people whose cognitive functioning differs from the statistical majority, including (but not limited to) dyslexia, ADHD, autism, dyspraxia, and dyscalculia. ‘Neurotypical’ describes people whose cognitive patterns fall within the range most social systems are designed for. Neither term implies deficit or superiority.

Where individuals quoted in this report have expressed a preference for specific terms, their preference has been used. Where the report discusses policy documents that use different terminology (for example, ‘learning disability’ in the Oliver McGowan framework, or ‘intellectual disability’ in international contexts), the original terminology is retained for accuracy.

Language in this area changes over time. The priority throughout has been clarity and respect.

Glossary of Abbreviations

Abbreviation	Full Term
AT	Assistive Technology
AtW	Access to Work (DWP employment support scheme)
CAM	Calling All Minds Ltd
CHQF	Creative Health Quality Framework
CRM	Customer Relationship Management (software)
D&A	Diversity and Ability Ltd (collapsed 2025)
DfE	Department for Education
DSA	Disabled Students' Allowance
DWP	Department for Work and Pensions
FOI	Freedom of Information
FTE	Full-Time Equivalent
ICO	Information Commissioner's Office
ILS	Integrated Library System
JAWS	Job Access With Speech (screen reader software)
KPI	Key Performance Indicator
M365	Microsoft 365
NAO	National Audit Office
NMH	Non-Medical Helper (DSA provider category)
NVDA	NonVisual Desktop Access (free screen reader)
PIP	Personal Independence Payment
PSC	Person with Significant Control (Companies House)
QTS	Qualified Teacher Status
SCVO	Scottish Council for Voluntary Organisations
SLC	Student Loans Company
SMA	Software Maintenance Agreement
STPCD	School Teachers' Pay and Conditions Document

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Section 1: The Case for Change in Education

1.1 The Medical Model Critique: Diagnosis-Led Support Is Inefficient

The entire DSA and Access to Work system is predicated on a diagnosis-led model. Before a disabled student or employee can access assistive technology, they must navigate a chain of gatekeeping steps that assumes the problem lies with the individual, not the environment.

The Current Gatekeeping Chain

Students in secondary and primary schools receive support on a needs basis, covering elements of their studies without requiring a formal diagnosis. This creates a clear discontinuity when students studying A-levels transition into universities, further education colleges, or apprenticeships. They face the challenge of having to learn independently with no framework in place. The current system places the onus on learners entering Level 4 courses: those who cannot access a diagnosis must then obtain an assessment and navigate the full DSA process.

A student seeking AT support must first obtain a clinical diagnosis (dyslexia, ADHD, autism, or similar), then apply through the Student Loans Company, wait for Capita or StudyTech to process the application, undergo a needs assessment to determine which specific technologies are appropriate, wait for equipment procurement and delivery, and finally receive limited training sessions, typically ten hours across five sessions. Each step adds weeks or months of delay, during which the student is struggling without support.

> *Students frequently arrive at their first training session having waited months for equipment. Licence codes may not have arrived. Dispatch notes may be missing. Equipment may be faulty (documented case: laptop charger not working, CRN 30380432312). The student's academic term is already well underway. The support they are entitled to arrives late, if it arrives at all.*

The medical model assumption is that each student needs a bespoke technology package, individually assessed and individually procured. In practice, the vast majority of DSA-funded AT consists of the same core tools: text-to-speech software, speech-to-text software, mind-mapping tools, and note-taking aids. The 'individual assessment' process adds cost and delay to deliver what is essentially a standard toolkit.

This is a standardised needs assessment dressed up as personalisation: a tick-box exercise allocating six to twelve hours to change a lifetime of learning. The assessment rarely captures what the learner already knows, what strategies they have already developed, or what free tools they are already using effectively. It deposits prescribed solutions rather than building on existing capability.

1.2 The Social Model of Disability in Technology

The Social Model of Disability holds that people are disabled by barriers in society, not by their condition. Applied to assistive technology, this means the problem is not that an individual needs specialist software. The problem is that mainstream environments are not designed to be inclusive by default, with support restricted to those entering Level 4 courses.

In 2010, when much of the current assessment infrastructure was designed, technology was limited. Built-in accessibility features were rudimentary, cloud computing was nascent, and specialist software genuinely offered capabilities unavailable elsewhere. The Equality Act 2010 was written for that technological context.

Fifteen years later, the technology has fundamentally changed, but the assessment and procurement infrastructure has not. There is no recognised space within education for the role technology plays in everyone's life, and the system leaves it up to individuals to navigate using a phone or a laptop within the school system.

Microsoft 365, Google Workspace, and Apple's operating systems now include comprehensive accessibility features at no additional cost: dictation, text-to-speech, immersive readers, focus modes, voice control, and screen readers. These are not inferior alternatives. They are industry-standard tools used by millions. Yet the DSA assessment process continues to default to specialist procurement because the checklist was designed for a world where these alternatives did not exist.

Inclusive Learning Contradicted by Exclusive Gateway

The fundamental contradiction is this: the system promotes inclusive learning through an exclusive gateway. To access tools that should be universally available, a learner must first prove they are 'disabled enough' through clinical diagnosis (costing £350–£600 privately if NHS waiting lists are too long), then navigate a five-tier bureaucracy. This creates precisely the barrier the Social Model identifies as the real problem.

There is also a populist dimension to this gatekeeping. The diagnosis requirement creates a perceived division: 'they get special support that I don't.' Sirin Kale's 2020 Guardian investigation into the contested nature of dyslexia diagnosis exposed exactly this tension: the label itself is debated by experts, yet the system requires it as a gateway to support. A universal access model dissolves this narrative. When tools are available to everyone, disability support is not a privilege. It is infrastructure.

This division is also created in the workplace, where clients have felt under pressure after technology was awarded to them which, after a couple of sessions, they felt could not serve its purpose. They felt guilty at decisions which were perfectly sound, as they worked on their strengths and used different strategies rather than the software that had been prescribed from a tick-list.

Starting the Conversation at School Level

The current system intervenes at university or employment, years after a learner has already developed their own relationship with technology. Every school-age child with a phone, tablet, desktop, or laptop has already encountered accessibility features, even if they do not recognise them as such. Voice typing, predictive text, dark mode, read-aloud functions: these are all assistive technologies used informally every day. At present, the school system mainly focuses on hard skills such as programming, with funded programmes directed at online safety, radicalisation awareness, and PSHE topics.

The conversation about assistive technology should start where the learner already is, not at a clinical assessment point years later where a list is handed down.

Although the research is over thirty years old, it still rings true. Phillips and Zhao (1993) established that the primary factor in assistive technology abandonment is lack of user input in selection. The Library Model addresses this directly: the learner tries tools, discovers what works, and builds confidence before any formal assessment or procurement takes place. The ‘lifetime loan of learning’ begins with discovery, not diagnosis.

1.3 The Documentation Gap: Why Mainstream AT Knowledge Remains at Feature Level

The Social Model principle established in Section 1.2 holds that the barrier is the environment, not the person. This section provides the concrete evidence: the way Apple, Google, and Microsoft document their own built-in accessibility features is itself a barrier to access. The documentation gap sustains the perception that mainstream tools are inadequate, drives technology abandonment, and maintains the specialist procurement model critiqued in Section 2.

1.3.1 The Three-Level Failure: Content, Context, and Presentation

The official support documentation provided by Apple, Google, and Microsoft for their built-in accessibility and productivity features fails at three interconnected levels: content, context, and presentation. The consequences are not merely inconvenient. They drive technology abandonment, sustain unnecessary specialist procurement, and exclude precisely the users these features were designed to serve.

At content level, all three platforms stop at feature identification. Apple’s MacBook Pro guide lists essential apps with single-sentence descriptions and a forwarding link to a separate support article. Google’s accessibility help page explains how to activate ChromeVox or Select to Speak through a settings menu toggle. Microsoft’s OneNote support describes notebook hierarchy as organisational containers. None of these resources addresses how a dyslexic student integrates Immersive Reader into an essay-drafting workflow, how an ADHD employee connects OneNote task tags to calendar blocking for time management, or how a visually impaired worker

chains Apple's built-in Magnifier with Microsoft Teams transcription to replace £4,500 of prescribed specialist software.

At context level, the three platforms treat each feature as isolated from every other. Apple presents a scrolling catalogue of app icons with no thread connecting them. Microsoft offers expandable accordion menus nested within accordion menus. Google is the worst offender: its Chromebook accessibility help page presents a numbered list of fourteen separate articles, each requiring a new click, with no indication of how one feature relates to another or which combination a particular user might actually need. There is no narrative, no motivation, and no recognition that a person arriving at these pages is trying to solve a problem in their life, not browse a product catalogue.

At presentation level, all three prioritise brand consistency over cognitive accessibility. Clean layouts with generous whitespace look professional in a design review. For a user with oculomotor difficulties, the combination of long vertical scroll, small interactive targets, and text-heavy instruction blocks creates sensory overwhelm before any learning begins. For a dyslexic user, dense paragraph instructions without visual anchoring are functionally inaccessible. For an autistic user, the lack of predictable structure and the constant requirement to navigate away to new pages disrupts orientation. Video tutorials exist but are typically feature demonstrations recorded in isolation; if the video does not match the user's exact operating system version, application state, or starting point, orientation is lost within seconds and the resource becomes noise rather than guidance.

1.3.2 The Scale of the Missed Opportunity: The Purple Pound

The business case for investing in workflow-level accessibility documentation is not ambiguous. The Purple Pound, the collective spending power of disabled consumers and their families in the UK, stands at close to £274 billion per year (SeeAbility). Scope's research, presented at TechShare Pro 2019, found that 75% of disabled people believe businesses are losing revenue due to poor inclusive design, and that 40% of UK households include at least one disabled member. Globally, between 1.3 and 2 billion people live with some form of disability, representing roughly 16% of the world's population, with a combined global spending power of around $13 trillion annually (Remarkable, 2024).

Scope found that disabled households underspend on education by 65% compared to income, with 33% reporting they would like to spend more but are prevented by accessibility barriers. This is a market that is actively trying to engage and being turned away. The documentation gap is one of those barriers.

1.3.3 Platform-by-Platform Evidence

Apple's Personal Voice was first introduced in May 2023 and made available on iOS 17 in September 2023, designed for people at risk of losing their ability to speak. The initial setup required reading 150 sentences aloud, with overnight on-device

processing: a significant stamina and cognitive demand for someone whose speech may already be deteriorating. Only in May 2025, over two years later, did Apple announce that Personal Voice would need just ten phrases and a few minutes to produce a usable voice. That is a two-year gap between launching a feature marketed for people losing their speech and making it practically usable by that population.

The Magnifier for Mac, a basic tool connecting an iPhone camera feed to a Mac screen for visual magnification, only arrived in 2025. Accessibility Reader, which lets users capture a physical page and adjust font, size, and colour on screen, was announced alongside Global Accessibility Awareness Day in May 2025. Apple has been selling Macs since 1984 and iPhones since 2007. It took until 2025 to provide an integrated tool that makes a printed page readable on screen.

The Google Chromebook accessibility help page presents fourteen separate articles covering screen readers, magnification, braille devices, text-to-speech, captions, switch access, and more, each requiring a new click, with no indication of how features relate to each other or which combination a user might need for their specific situation. The instructions are technically accurate but entirely decontextualised. Google's approach exemplifies the list-as-documentation model: every feature is present, every toggle is described, but the user is given no framework for understanding which features work together, which are alternatives, or how to build a coherent workflow from the components.

Note: The pattern of feature-identification-as-qualification extends into Microsoft's formal certification model and the ECDL/ICDL framework. The detailed evidence is set out in Appendix F.

1.3.4 A Twenty-Six-Year Pattern and Its Structural Incentives

This is not a recent oversight. It is a pattern that has persisted since mainstream operating systems first introduced accessibility settings in the late 1990s. Three structural incentives maintain the status quo.

Revenue model misalignment. Apple, Google, and Microsoft generate revenue from feature adoption and platform lock-in, not from adaptive use. Workflow-level documentation would cannibalise the specialist AT market that these same companies partner with through institutional procurement channels.

Update maintenance burden. Feature-level documentation survives platform updates more cheaply than workflow documentation. Apple has shipped a new macOS version annually since 2012. A workflow guide showing how to chain three features together must be rewritten when any one changes.

Compliance framework rewards feature existence. Under the European Accessibility Act (effective June 2025), the UK's Public Sector Bodies Accessibility Regulations 2018, and equivalent international standards, the regulatory test is

whether a feature exists and is technically operable, not whether a user can discover, learn, and integrate it without human assistance.

1.3.5 The Link to Technology Abandonment

Phillips and Zhao's foundational 1993 study found that 29.3% of all assistive devices were completely abandoned, with four factors significantly related: lack of consideration of user opinion in selection, easy device procurement, poor device performance, and change in user needs. Petrie, Carmien, and Lewis (2018) confirmed that the myth that a user's AT requirements need be assessed just once is itself a primary cause of abandonment. A 2024 NIHR evidence review found that up to seven in ten people abandon their assistive technology, identifying six interconnected barriers including lack of training and support.

A 2025 Frontiers in Digital Health study found that many assistive technologies are now offered without any structured training, leaving users to navigate complex functions alone, and that abandonment may be rising at alarming rates as a result. This maps directly onto the documentation gap: the platform providers' feature-level documentation is the AT equivalent of delivering a device without training.

1.3.6 What Closes the Gap: The Case for Conversation

Training platforms operating within the DSA and Access to Work ecosystems, such as Aspire Strategies and Learning Labs, replicate the same feature-demonstration model. Short videos show where the button is; they do not show how pressing that button fits into the sequence of actions that constitutes the user's actual work.

What the evidence consistently demonstrates is that closing the documentation gap requires conversation with a knowledgeable person who can do four things that no support page, video tutorial, or certification programme currently does.

First, assess existing capability. A learner arriving for AT support is not a blank slate. They have existing strategies, tools they already use, workarounds they have developed over years.

Second, map tools to actual workflow. Connecting Immersive Reader to an essay-drafting process, linking OneNote tags to calendar blocking for ADHD time management, chaining Apple's Magnifier with Teams transcription for a visually impaired NHS worker: these require understanding the person, not just the product.

Third, pick up nuance. A person with dyslexia and ADHD comorbidity has different needs from a person with dyslexia alone. A neurodivergent learner who has spent years masking will present differently from one who has had consistent support. These nuances are invisible to documentation; they are the first thing a skilled AT trainer observes.

Fourth, adapt as both the learner and the technology change. Platform updates arrive annually. The learner's needs evolve. The AT trainer provides continuity across both kinds of change, something no static resource can replicate.

This is precisely the professional AT trainer role that the Library Model funds at Tier 2: professionally delivered adaptive workflow development, study skills technology integration, and workplace AT configuration. It is the role the current procurement architecture bypasses by prescribing products instead of building capacity.

1.4 The Cognitive Load Problem

For neurodivergent students and workers, the very people the system is designed to support, the administrative complexity of accessing that support creates an additional, often insurmountable barrier. The system demands sustained executive function (tracking applications, responding to correspondence, managing cancellation policies) from people whose condition specifically affects executive function.

> *Study Tech /Capita's rules allow only two cancellations for the entire duration of a degree. For a student juggling final-year studies, employment, and health conditions, this rigid policy can mean losing access to support entirely, not because they don't need it, but because the system is designed without understanding the realities of the people it serves.*
>
> *The question is whether this policy exists to hit a delivery target rather than to serve learners. The cost of prescribed equipment, the expense of assessment, and the long-term impact on a student's ability to learn are all sacrificed for a metric that serves the company, not the person.*

1.5 The Cliff Edge: DSA to AtW to Life

One of the most damaging structural failures is the complete disconnect between DSA (education) and Access to Work (employment). These two schemes fund essentially the same support, assistive technology, coaching, and training, but operate as entirely separate systems with no continuity.

The cliff edge does not only occur at graduation. It recurs at every transition in a person's life.

Transition	What Happens	Impact
GCSE → BTEC/A-levels	Support arrangements change between institutions	Learner restarts from zero
School/College → University	DSA application required; new needs assessment	Months of delay; strategies discarded
University → Employment	DSA ends; AtW application required	10-month wait (2025 data); complete restart
Employment → Unemployment	AtW support ends; no UC-linked AT provision	Digital skills needed for job search but unavailable
Retraining / Career change	New AtW application required	Previous assessment irrelevant to new role
Elderly / Retired	No scheme covers ongoing AT needs	Technology skills built over decades unsupported

Current Access to Work waiting times are approximately ten months. The February 2026 NAO report (HC 1644) documents that average processing time has increased from 28 days (2020–21) to 109 days (2024–25): a 289% increase. The decision backlog has grown from 21,700 to 62,100 (186% increase), and outstanding payments from 6,900 to 31,700 (359% increase). Staffing doubled from 247 to 588 over the same period, yet outcomes worsened. The problem is structural, not resourcing.

> *A pharmacy student completing her final year, juggling illness, work, and studies, received her AT support late. She used her cancellation allowance due to legitimate health and work conflicts. On graduation, her DSA support ends. To get equivalent support in employment, she must reapply through AtW. She already knows what tools work for her. She already has the skills from AT training. But the system treats her as a blank slate.*

1.6 Governance Failure: Who Approves the Providers?

The supply-side governance of DSA provision was exposed by the collapse of Diversity and Ability Ltd (D&A) in 2025, which left workers unpaid and thousands of students without support. A systematic FOI investigation into the successor company, Calling All Minds Ltd (CAM), revealed that no institution in the approval chain conducts meaningful due diligence.

Date	Event	Governance Implication
20 March 2025	CAM incorporated (Company 16330062)	Formed 1 day before D&A liquidation announced
15 April 2025	RCA students told ‘wait for replacement company’	Pre-planning evident: 27 days before liquidation
8 May 2025	DfE approves CAM registration as NMH provider	Approved despite overlapping directors with failed company
12 May 2025	D&A enters liquidation (£648k owed)	100+ predominantly disabled associates left unpaid (£193k)
15 May 2025	SLC Operational Group meeting	Internal officials call DfE approval ‘outrageous’

Institutional Responses to FOI Requests

FOI requests to six institutions whose logos appeared on the CAM website revealed a consistent pattern: no institution had authorised the logo use, and none had independently identified or acted on the issue. The silence was itself telling. None of the institutions expressed concern about the collapse of D&A or its impact on students and workers. The FOI process itself became the accountability mechanism.

Institution	FOI Response	Governance Implication
Goldsmiths University	Suspended CAM from supplier system	Reactive: only acted when challenged
University of Cambridge	Denies any relationship with CAM	Brand unprotected; no monitoring
Imperial College London	‘No due diligence for low value suppliers’	Governance gap for this provider type
Transport for London	Confirms no relationship (FOI-2668-2526)	Logo displayed without authorisation
UCAS	Refused disclosure; brand protection ‘outside designated function’	ICO complaint in progress (IC-480538-W2B6)
Royal College of Art	Response included SLC minutes with ‘outrageous’ comment	Internal dissent suppressed by process

ICO investigations are in progress for both Imperial College London (IC-480494-R5H0) and UCAS (IC-480538-W2B6). As of March 2026, UCAS’s DSA guidance page states ‘Content provided by Calling All Minds’, meaning CAM is actively providing editorial content on the primary student application platform despite the governance concerns documented here.

Following the FOI requests, the unauthorised logos were removed from the CAM website. This confirms the logos were displayed without authorisation and that the FOI process itself was the accountability mechanism. No institution had independently noticed or acted.

Six Types of Governance Failure

Failure Type	Institution	Evidence
No accountability infrastructure	SLC	‘Does not undertake due diligence on NMH providers’
Inherited without baseline	DfE	Approval criteria inherited from DSA-QAG (2019) without documentation
Regulations permit gaps	Universities	‘No due diligence for low value suppliers’ (Imperial)
Internal dissent ignored	SLC/DfE	‘Outrageous’ comment documented but approval proceeded
Violations without enforcement	CAM	Logos displayed without authorisation; no consequences
Tick-box compliance	Goldsmiths	‘Only uses DfE-approved suppliers’ = no independent checking

The Student Loans Company admitted it ‘does not undertake’ monitoring of NMH providers. The Department for Education rated D&A’s audit as ‘satisfactory’ ten months before its collapse. DfE holds no original approval criteria, having inherited the process from DSA-QAG in 2019 without baseline documentation. The system does not fail at oversight. It has no capacity for oversight.

Market Concentration and the Closed Ecosystem

The same structural conditions that enabled D&A’s collapse, no contracts, no due diligence, no enforcement, also enabled a broader pattern of market concentration. The DSA and Access to Work landscape has shifted from an open market encouraging innovation to a closed ecosystem where a small number of private companies profit from subcontracting arrangements with minimal performance accountability. Capita administers DSA whilst simultaneously benefiting from needs assessments conducted in-house, assessments that were formerly carried out by independent assessors through face-to-face visits but have increasingly shifted to standardised online delivery.

This consolidation of commissioning, assessment, and administration within the same corporate structure removes the competitive tension that should drive quality. The result is a market where public funds flow not toward the most effective support for disabled learners, but toward the most efficient extraction of value from a captive contracting chain.

The human cost: over 100 predominantly disabled associates were owed approximately £193,000 in unpaid wages, with no evidence of wage protection or redundancy payments. An estimated 3,276 students were affected nationally, losing essential academic support mid-year.

Section 2: Financial and Operational Inefficiency

2.1 The Inefficiency of Individualised Procurement

The current model funds individual software licences and hardware for each DSA recipient. This per-person procurement approach is inherently more expensive than bulk or institutional licensing, and creates enormous administrative overhead relative to the value delivered.

The Subscription Trap

The shift from perpetual software licences to subscription models has inflated public spending on assistive technology with no corresponding improvement in outcomes for learners. This pattern is systematic across the AT procurement landscape.

Product	Old Model (Perpetual)	New Model (Subscription)	3-Year Cost Increase
JAWS Professional	£995 one-time (+ £155 SMA)	£420/year (£1,260 total)	+27%
Dragon Professional	£500 one-time	£600–1,200/year (medical/enterprise)	+260–620%
Read&Write (DSA)	£385 perpetual	£250/year individual (£750 total)	+95%
MindManager	£350 one-time	£180/year (£540 total)	+54%
Adobe Acrobat	£450 one-time	£600/year (£1,800 total)	+300%
NVDA (free alternative)	£0	£0	N/A

Note: JAWS pricing verified against Sight and Sound Technology (UK distributor) September 2025 pricing. The mandatory Software Maintenance Agreement effectively removes the perpetual licence option. Read&Write DSA perpetual pricing verified at £385 ex. VAT for 2026 academic year.

The Double Subsidy

Microsoft acquired Nuance (maker of Dragon) in 2021 for $19.7 billion. Government now frequently pays £600–£1,200 annually per user for Dragon while simultaneously paying for Microsoft 365 licences that include comparable voice typing at no additional cost. The state is subsidising the same technology twice: once through the M365 enterprise licence and again through a Dragon subscription that uses the same underlying cloud speech recognition engine (deployed since 2012, before the Nuance acquisition).

This pattern extends beyond speech recognition. Caption.Ed Pro (AtW Edition) is priced at £2,097.60 for a 3,000-minute, three-year licence, while Microsoft Teams transcription, included in existing M365 subscriptions at no additional cost, provides

comparable real-time captioning for many workplace scenarios. The detailed pricing comparison is set out in Appendix E.

> *A student receives a DSA allowance of up to £27,783 (England, 2025/26 academic year). Under the old perpetual model, £5,000 on equipment and software could last the duration of their degree. Under subscription pricing, £5,000 equipment plus £2,000/year in subscriptions means support is exhausted in approximately 2.5 years. The subscription shift effectively halves the duration of DSA support.*

2.2 Equipment Mismatch: Assessment Theatre

The checklist-driven needs assessment process routinely results in expensive equipment being prescribed that does not match the learner's actual workflow or preferences.

Item Prescribed	Cost	Outcome
ZoomText Fusion Professional 2025	£2,138.40	Unwanted: not suited to workflow
Caption.Ed Pro (AtW Edition)	£2,097.00	Unwanted: not suited to workflow
AT Training sessions	£288.00	Delivered
Technical support (ongoing)	£100–200/year	Not utilised
TOTAL INITIAL COST	**£4,523.40+**	

These figures are independently confirmed by an Access to Work grant letter dated 2 January 2025 (reference 100680930, Greater Manchester ICB), which prescribed identical products at identical costs for a different recipient. The total support package in that case was £18,679.57. This is not an isolated case; it is a standard prescription pattern.

> *After conversation with the AT trainer during sessions, this NHS client with visual impairment determined that Microsoft Teams transcription (free with existing M365 licence) combined with the built-in Magnifier and Microsoft's accessibility reader met their workflow needs better than the £4,500+ of prescribed specialist software. A conversation-first approach would have identified this before thousands of public funds were spent on software the client did not want and would not use. In over four years of working with Access to Work clients, only one knew the system well enough to request specific tools because they felt comfortable doing so. That was an informed decision. The process as designed does not produce informed decisions.*

The Active-to-Passive Agency Shift

The shift from 'I know what works for me' to 'they tell me what I need' turns learners from active participants in their own solutions into passive recipients of prescribed interventions. This disrupts the consistency they have developed and can have a significant effect on how the learner interacts with support systems going forward.

2.3 The Five-Tier Burden on Students and Providers

The DSA Contracting Chain

Tier	Organisation	Role	System Used
1 (Funding)	Student Loans Company	Funding source	SLC Portal
2 (Administration)	Capita	DSA administrator	Capita Systems
3 (Prime Contractor)	Remtek Systems Ltd	Equipment + training provider	OpenCRM / Calendly / Remtek Forms
4 (Subcontractor)	STAT Northern Ltd	Subcontractor administration	Weekly Remtek reports
5 (Delivery)	Individual AT Trainer	Actual service delivery	Calendly / JotForm / email

The Access to Work Parallel Chain

Access to Work mirrors DSA's multi-tier structure with its own layers of bureaucracy. Current data indicates that one in three AtW applications is now denied, a 22% increase over previous years, further restricting access to a scheme already described as 'the best kept secret in government.'

Tier	Actor	Role	Barrier Created
1	DWP Policy (Whitehall)	Sets rules, budgets, requirements	Postal-only SA100 rule; 24-week standard routinely breached
2	DWP Operations (Wolverhampton)	Case workers process applications	No triage for urgent cases
3	Outsourced Needs Assessor	Conducts standardised assessment	Checklist-driven; ignores applicant expertise
4	Equipment Supplier	Procures and delivers	6-month delivery; equipment mismatch
5	Training Subcontractor	Delivers AT training	Zero-hour; bears system failure cost

> *From January 2026, DWP requires SA100 tax returns to be submitted by post to the Wolverhampton mail handling site. This requires a neurodivergent person applying for disability support to: navigate the complex Government Gateway digital system, locate the correct SA100 among potentially multiple HMRC accounts, download and print the document, and physically post it. This creates a digital-to-physical barrier for a service designed to support people whose conditions specifically affect executive function and digital navigation.*

The Timms Review and ‘Cuts Before Evidence’

Minister Sir Stephen Timms’s review of disability support runs parallel to the documented procurement failures. The government included in the Universal Credit and Personal Independence Payment Bill provisions to implement a ‘4-point rule’ for PIP eligibility, before the Timms Review was due to conclude (Autumn 2026). Only after significant parliamentary pressure at second reading on 1 July 2025 was this clause removed from the Bill. The IFS noted that the government’s changes significantly reduced projected savings, with forecast social security spending now higher than planned because the centrepiece of the Bill had been abandoned.

Budget management trumps evidence-based policy design. In assistive technology, this manifests as: delays treated as budget management (slowing applications reduces in-year spend); subscription models accepted without cost-benefit analysis; assessment theatre maintained to create an appearance of rigour while adding cost; and the review itself being overtaken by legislation before it can report.

2.4 Systemic Waste: Documented Data Loss

The five-tier contracting structure that delivers DSA-funded AT training relies on an integration chain between Calendly (booking), OpenCRM (session management), Remtek Forms (timesheet submission), and the Remtek reporting system. Each integration point is a potential failure point. When the chain breaks, the trainer delivers the work, the student receives the training, but the system loses the record.

In November 2025, a systematic reconciliation between Calendly booking data and Remtek’s OpenCRM reporting revealed that 11 out of 37 sessions (29.7%) were present in the booking system but absent from the official reporting system. The financial exposure for the zero-hour trainer was £572 in delivered but unrecorded work, plus approximately four hours of unpaid administrative time to identify and resolve the discrepancies.

This is not an isolated case. Evidence from a post-collapse D&A trainer group (March 2025) shows multiple trainers reporting identical Remtek system failures: sessions not loading, invoices delayed, manual workarounds required. One trainer described the invoicing backlog as a source of significant anxiety. Another had been forced to sign on for Universal Credit while waiting for system issues to resolve.

The operational manager at STAT Northern confirmed the discrepancy and worked to resolve it, demonstrating that the human response within the chain functions. The systemic failure sits at the integration architecture level: no automated reconciliation, no error alerts to trainers, no retry logic when webhooks fail, and no accountability for data loss between systems chosen and managed by the prime contractor.

Note: detailed CRM system failure mechanics, including data format mismatches, webhook failure analysis, and the full reconciliation table, are documented in the CRM System Failure Case Study (Appendix G).

2.5 The Neurodivergent Workforce Paradox

The system's complexity drives away the very practitioners best placed to deliver effective support. Neurodivergent AT trainers, the people with deepest empathy and understanding of their students' needs, face a structural trade-off.

Factor	Structured Work (£26/hr)	Unstructured Work (£35/hr)
Administrative burden	Lower (clear SOPs, managed scheduling)	Higher (chasing learners, follow-up)
Cognitive load	Sustainable for ADHD trainers	Overwhelming over time
System reliability	29.7% failure rate (documented)	Variable, but fewer integration points
Income security	Predictable (when systems work)	Higher rate but unpredictable
Net effective rate	Below minimum wage when admin factored	Higher nominal but unsustainable

Cost Element	Per Session	Monthly (est.)	Annual (est.)
Session delivery (2hrs @ £26)	£52	£2,080	£24,960
Non-payment risk (29.7% failure)	£52	£618	£7,416
Unpaid admin to resolve (0.5hrs)	£13	£156	£1,872
Total cost per failed session	**£65**	**£780**	**£9,360**

For a zero-hour contractor earning approximately £2,000–£3,000 per month, a 29.7% system failure rate represents 26–39% income risk. This is structural precarity built into the delivery model. The system makes frontline disability support delivery financially precarious for exactly the people it should be supporting.

Stated Policy vs Actual Outcome: DWP Communication

DWP states its commitment to the Equality Act 2010, reasonable adjustments, and accessible communication for disabled claimants. Access to Work exists specifically to remove barriers to employment for disabled people.

The actual outcome: DWP's default communication method for Access to Work applicants is postal correspondence, a process that is structurally inaccessible for the neurodivergent population the scheme is designed to serve. In the case of application V3L6OJLX, a formal reasonable adjustment request was required before email communication was established at all. Even then, confirmation arrived from a restricted departmental inbox (the Alternative Format team) with no direct route to the substantive claims handler. The applicant, an AT trainer with ADHD, dyslexia, and autism, was required to use a third-party AI tool simply to parse the content of official DWP correspondence and draft a coherent response. This was not a

personal choice but a documented necessity, caused directly by the inaccessibility of the original communication format.

The stated policy commitment to reasonable adjustments is undermined when applicants must specifically request what should be default practice for a disability employment scheme. This pattern mirrors the tick-box compliance culture documented across the D&A/CAM governance evidence: a system that measures compliance by whether a process exists, not whether it works for the people it is meant to serve.

Section 2A: Corporate Capture

The Commercial Architecture That Profits from System Failure

Sections 1 and 2 documented what is failing. This section documents who benefits from those failures. The evidence reveals two parallel consolidation chains, both backed by private equity capital, that have restructured the UK's assistive technology market between 2015 and 2025. These chains vertically integrate assessment, supply, and support into corporate structures where the same entities that advise on what a disabled student needs are financially connected to the companies that sell it. The result is what this report terms the Double Subsidy: public funds are captured twice, once for the advisory service and once for the product recommended by that service.

2A.1 The Vision AT Chain: Vector Capital, Vispero, and Sight and Sound

In September 2015, Vector Capital, a San Francisco-based private equity firm with over $2.5 billion under management, simultaneously acquired Freedom Scientific and Optelec to create Vispero. In January 2018, Vispero merged with Enhanced Vision to form what the companies described as the world's largest assistive technology provider for the visually impaired. Vispero's product portfolio includes JAWS (Job Access With Speech), the world's most widely used screen reader; ZoomText, the dominant screen magnification software; and Fusion, which combines both.

In the UK, Sight and Sound Technology Limited is the sole distributor of Vispero's products. Every JAWS licence, every ZoomText licence, and every Fusion licence procured through the DSA or Access to Work in the United Kingdom passes through Sight and Sound.

In May 2025, Vispero moved JAWS, ZoomText, and Fusion to subscription licensing, with UK pricing set at £420 for one year, £790 for two years, and £1,255 for three years. Perpetual licences remain available but at £1,850 with a mandatory Software Maintenance Agreement. In October 2024, the BBC Radio 4 programme 'In Touch' dedicated a segment to the JAWS pricing changes, interviewing both Vispero and Sight and Sound, documenting confusion and concern among visually impaired users.

2A.2 The Literacy and Neurodiversity AT Chain: Five Arrows, Everway, and the Software Monopoly

In March 2024, Texthelp and n2y merged under the 'Everway' brand, backed by Five Arrows, the alternative assets arm of Rothschild and Co, which manages €27 billion in assets and targets sectors with 'highly defensible market positions' and 'strong unit economics.' The Everway acquisition trail includes: n2y (special education

curriculum), Don Johnston Inc. (Snap&Read and Co:Writer absorbed into Read&Write), Embrace Education (Medicaid billing and special education administrative software), SpedTrack (IEP compliance), and TeachTown (educator tools for diverse needs).

With over 50 million users for Read&Write alone, Everway has created a position where its products are the de facto standard in education settings. The rebranding was explicitly described as the first step in becoming a 'category leader.' Simultaneously, Everway has pursued enterprise DEI contracts with organisations including EY, KPMG, and Westminster City Council, leveraging market dominance established through public subsidy to capture private-sector revenue.

2A.3 The Assessment-to-Supply Pipeline: StudyTech, Sight and Sound, and the Double Subsidy

The two consolidation chains converge at the point where assessment meets procurement. StudyTech Limited was incorporated on 27 March 2023, a purpose-built entity designed to secure DSA regional lots. Companies House records reveal that Sight and Sound Technology Limited holds 25–50% of shares as a person with significant control (PSC), alongside Assistive Solutions Ltd (25–50%). Glenn Vincent Tookey was appointed director on the day of incorporation and is also a key figure in Sight and Sound. StudyTech operates from the same registered address as Sight and Sound: Equilibrium House, Mansion Close, Northampton, NN3 6RU.

Sight and Sound Technology Limited is simultaneously the sole UK distributor of Vispero's JAWS, ZoomText, and Fusion products and a person with significant control over StudyTech, the DSA regional provider. StudyTech holds Lots 1 and 4 of the DSA framework, covering the Northwest, Northeast, Yorkshire and Humber, Southwest, Southeast, and Scotland. This creates the Double Subsidy pathway: when StudyTech manages a student's DSA journey and assessments recommend products distributed by Sight and Sound, the corporate group captures both the service fee and the product margin.

2A.4 The Framework Architecture: £400 Million and Two Providers

In February 2024, the Student Loans Company launched the enhanced DSA service model, concentrating needs assessments, assistive technology supply, and AT training into two primary suppliers: Capita and StudyTech. The framework is valued at approximately £400 million over five years and divides England and Wales into four geographical lots: Lot 1 (Northwest, Northeast, Yorkshire and Humber) to StudyTech; Lot 2 (Midlands, East of England) to Capita; Lot 3 (London, Wales, Northern Ireland) to Capita; Lot 4 (Southwest, Southeast, Scotland) to StudyTech.

This duopoly replaced a diverse ecosystem of specialist providers with a rigid corporate structure. Below the prime contractors, actual delivery is devolved to

smaller providers, STAT Northern, Remtek, Neurobox, and others, who operate on zero-hour contracts and bear all the financial risk of system failures they did not cause.

2A.5 The Extraction Arithmetic

A trainer delivering DSA-funded AT support through the current chain is paid £26 per hour on a zero-hour contract. The rate charged to the public purse for that same hour is substantially higher, with the difference absorbed by each tier. A £100,000 budget currently procures approximately 1,800 hours of support through this architecture. Under the Library Model's direct employment structure, the same £100,000 funds 3.5 full-time AT specialists providing nearly 7,000 hours of support: a fourfold increase for the same expenditure.

2A.6 The Subscription Shift: From One-Off Procurement to Recurring Revenue

Both consolidation chains are executing the same pricing strategy: moving from perpetual licences to subscription models. This transforms one-off public expenditure into recurring revenue streams and creates a cliff-edge for users when funding periods end. In the vision AT chain, JAWS moved to subscription licensing in May 2025 at £420 per year. In the literacy chain, Everway's enterprise model prices Read&Write on per-user annual subscriptions. A DSA student receives a funded subscription; on graduation, the subscription must be re-procured through Access to Work. If the AtW application takes 18 months, the student loses access to their tools for the duration.

The subscription shift effectively halves the duration of DSA support: a £5,000 equipment and software allowance that previously lasted a full degree under perpetual licensing is exhausted in approximately 2.5 years under subscription pricing. Neither DWP nor SLC tracks software licence renewal rates or abandonment rates. If abandonment is high, it proves waste. If no tracking exists, it proves no accountability. Either outcome strengthens the case for reform.

2A.7 The Political Context: JAWS in Job Centres and the Timms Interview

In a BBC Radio 4 'In Touch' interview, Sir Stephen Timms, then newly appointed as Labour's Minister for Social Security and Disability, responded to questions about benefits, digital accessibility legislation, and the Access to Work crisis. A separate 'In Touch' programme examined the JAWS pricing changes in detail, hearing from Vispero and Sight and Sound.

The political significance is this: the minister responsible for disability policy was being asked about digital accessibility at the same time that the sole UK distributor of the most critical vision AT software was raising prices and shifting to subscription

licensing, whilst simultaneously holding a controlling stake in one of only two DSA regional providers. The system's architecture means these developments are treated as separate issues when they are manifestations of a single structural problem: the absence of governance across a vertically integrated market sustained entirely by public funds.

Job centres trialling JAWS on public terminals illustrate the environmental dimension of this failure. The job centre is structured around closed, deficit-based questioning: 'How much does your disability affect you out of work?' One Access to Work client reported feeling immediately under scrutiny with this framing. There is no space for exploration, independence, or conversation about strengths. The same software that is being trialled in this hostile environment subsequently receives a price increase from its equity-backed parent company. The Library Model proposes an alternative: the same tools, in a trusted community space designed for learning, where the questions begin with what you can do rather than what you cannot.

2A.8 The Chain the Library Model Breaks

Top of chain (platform providers): Apple, Google, and Microsoft leave a documentation gap that sustains the perception that mainstream tools are inadequate (Section 1.3).

Middle of chain (commercial consolidation): Everway consolidates the literacy and neurodiversity software supply side, backed by Five Arrows/Rothschild. Vispero consolidates the vision AT supply side, backed by Vector Capital. Both shift to subscription pricing. Sight and Sound vertically integrates assessment with equipment supply through StudyTech. Capita holds the master integrator role.

Bottom of chain (delivery): Remtek, STAT Northern, Neurobox, and individual trainers deliver the actual work on zero-hour contracts at £26 per hour, bearing all financial risk of system failures within a 29.7% data loss architecture they did not design and cannot control.

The Library Model breaks this chain at every point. It replaces individual procurement with institutional infrastructure. It replaces the five-tier contracting chain with direct employment. It replaces prescribed specialist software with a conversation-first approach that starts with the free tools already in the learner's pocket. It replaces the subscription trap with bulk institutional licensing. And it replaces the Double Subsidy with a transparent, publicly accountable funding model where the entity advising the learner has no financial interest in what they recommend.

The question is not whether the Library Model would work. The evidence in this section demonstrates that the current model works, for the corporate entities embedded within its architecture. The question is whether policymakers have the

courage to redirect public funds from those entities to the disabled people the system was designed to serve.

Section 3: The Library Model Blueprint

An infrastructure-based approach to assistive technology provision that replaces individual procurement with universal access, and diagnosis-led assessment with conversation-led discovery.

3.1 Inclusive by Default

Stop asking: ‘What’s wrong with this person, and what individual fix do they need?’ Start asking: ‘What tools should be universally available so that no one is disadvantaged? How can we broaden out the skill set across life challenges and transitions, within a more holistic framework?’ This is the Social Model of Disability applied to technology provision.

The vast majority of assistive technology used by DSA and AtW recipients falls into a small number of categories: text-to-speech, speech-to-text, mind-mapping, note-taking, reading support, and organisational tools. Most of these are now available as cloud-based subscriptions that can be licensed institutionally rather than individually, or are built into mainstream platforms at no additional cost.

Under the Library Model, access is immediate: any student or employee identified as potentially benefiting from AT can use the tools without waiting for diagnosis, assessment, or procurement. There is no gatekeeping: a student struggling with reading speed does not need a dyslexia diagnosis to benefit from text-to-speech software. Stigma is reduced because when tools are available to everyone, using them is normalised rather than medicalised. And support becomes preventive rather than remedial: students get support at the point of need rather than months later when they may already be failing.

3.2 How People Actually Learn: Conversation, Discovery, and the Phone in Their Pocket

The standardised assessment and the European driving licence theory test have something in common: they treat learning as a tick-box exercise. Complete the module, pass the assessment, receive the certificate. This does not reflect how people, especially neurodivergent people, actually interact with technology.

The Phone as the First Assistive Technology

Every person who walks into an AT training session already has a relationship with technology. They use voice typing to send messages. They use predictive text without thinking about it. They rely on reminders and calendar alerts. These are all accessibility features, used informally, without any diagnosis, assessment, or procurement chain.

The smartphone is the most widely adopted assistive technology device in history, and nobody needed a needs assessment to access it. The settings menus use

language that is rarely clear or motivating. This may involve adjusting font sizes, using dark mode, or discovering features such as Apple's VoiceOver, Android's TalkBack, and the built-in dictation on both platforms, which represent industrial-scale accessibility deployment. The current DSA/AtW system ignores this entirely. It begins the conversation at the point of clinical diagnosis and specialist procurement, rather than at the point of the device in the learner's pocket.

The UK's digital skills gap, estimated to cost the economy £63 billion per year, with 18% of adults (7.5 million people) lacking essential workplace digital skills, is not primarily a technology access problem. Ofcom's 2024 report found that almost 70% of those without internet access at home cited lack of interest or perceived need, not cost. This is a motivation and relevance problem. The Library Model addresses it by making technology interesting and available in a place people already go, starting with what they already know.

Conversation as Pedagogy: The Freire Connection

Paulo Freire's critique of 'banking education', where the teacher deposits knowledge into passive students, maps precisely onto the current DSA assessment model. The assessor reviews a checklist, prescribes from a list, and 'deposits' technology onto the learner. The learner's own experience, strategies, and preferences are irrelevant to the process.

Freire argued that the foremost duty of a teacher is to create and maintain a dialogical exchange, a horizontal relationship where teacher and learner work together. The learner's reality is affirmed, not overridden. This is not abstract educational theory; it describes exactly what happens in effective AT training sessions. The trainer asks: 'Show me what you already use. What works for you? Where do you get stuck?' The conversation builds from the learner's existing capability, not from a blank-slate prescription. Learners focus on the areas in their workflow that are creating strain, and the trainer shows areas that can be improved, not by funnelling through a prescribed list but by making connections.

In an era of AI-driven content delivery, Freire's insistence on dialogue and humanisation serves as a necessary counterweight. The nuance of lived experience operates outside the constraints of a language model, with emotions and threads that may emerge in the moment needing to be addressed through conversation, not through a funnel.

The current DSA system delivers AI-era technology through a 20th-century banking model. The Library Model delivers it through conversation.

Community-based approaches to support delivery, from the WHO's Community-Based Rehabilitation framework, which treats assistive technology as infrastructure rather than prescription, to Zimbabwe's Friendship Bench programme, which delivers effective mental health support through trained community members on park benches rather than clinical settings, demonstrate that meaningful support does not

require clinical gatekeeping. These models share the Library Model's core insight: start where the person is, use the resources already available in the community, and build from conversation rather than diagnosis.

Rubber Duck Debugging and the Power of Talking It Through

In software development, 'rubber duck debugging' is a recognised technique: explaining a problem aloud, even to an inanimate object, forces the clarity needed to solve it. Neurodivergent learners are already practising a version of this. Adults with ADHD use conversational AI as an executive function tool: one parent described her daughter using an AI chatbot to 'talk it out, as if it were her tutor,' then editing the results into something uniquely hers. AT trainers report learners using multiple conversational tools simultaneously to process information from different angles.

The Library Model builds this insight into its service design: Mode A drop-in support is essentially a structured conversation, 'bring your device, show me what's not working, let's figure it out together.' This is Freirean pedagogy in practice, funded through infrastructure rather than per-session procurement. The AT trainers working through Neurobox, Remtek, and STAT Northern already possess the skills to deliver this kind of support, skills that are unrecognised and underutilised in a system built on process and subcontracting rather than conversation and expertise.

A more direct model opens up options for everyone: in-person, remote, drop-in, experimental, with the library as the anchor point for learning.

3.3 Operational Flow: How the Library Would Work

Software: Cloud-Based Institutional Licensing

The emphasis should begin with the tools people already have: Apple, Windows, Android, and Apple phones as the starting point. Trial versions of specialist software would be available on library laptops, with the learner building up to using them over time. Acquiring a full licence would require a commitment from the user to demonstrate over a period that the tool is a useful resource. Hardware such as laptops and tablets could be managed through a loan system.

Instead of procuring individual software licences for each DSA recipient, institutions (universities, employers, public hubs) would hold site licences or subscription pools for core AT tools. Students and employees would activate access through their institutional login, with no separate procurement chain required. Licence costs drop dramatically through bulk purchasing. No dispatch notes, no licence code emails, no activation failures. Software updates are managed centrally. Access can be activated in minutes, not months.

Hardware: Reusable Pool and Loan Model

For hardware (specialist keyboards, ergonomic equipment, reading devices), the Library Model uses a loan pool approach, similar to how university libraries loan

laptops. Equipment is maintained, circulated, and upgraded centrally rather than individually purchased for each student and discarded or forgotten after they graduate.

Training: Drop-In and On-Demand

Rather than allocating exactly ten hours of training per student through a five-tier contracting chain, the Library Model offers training as an ongoing resource through three service modes. By scaling the system to include outreach in schools, sixth forms, and further education, the result is a coherent system where learners who find the support helpful can transfer with each transition without meeting a barrier or navigating an inbox full of emails and online booking systems.

Mode	Description	Access Method
Mode A: Drop-In Support	Immediate, no-appointment assistance for built-in tools (Windows/Apple accessibility, voice typing, screen readers)	Walk in; no booking required
Mode B: Specialist Appointments	In-depth, scheduled support for complex needs and specialist hardware	Booked directly with AT specialist
Mode C: Remote Support	Continuous learning support via screen-sharing and tele-consultation	Online booking; accessible from anywhere

The Library Exploration Section

A key innovation of the Library Model is the exploration section: a space where learners can freely trial mind-mapping software, recording programmes, organisational tools, and reading support applications. The purpose is to let learners discover what works in their actual workflow before any procurement takes place.

This removes the perverse incentive for companies to sell products nobody wants. It creates a tracking mechanism for individual learning profiles that identifies genuine need, and then enables formal support, rather than wasting DSA applications on prescribed equipment that goes unused. The exploration section is where the ‘lifetime loan of learning’ begins.

3.4 The Learner Passport

The DSA-to-AtW cliff edge is not just a funding gap. It is an information gap. Everything the learner has discovered about what works for them is lost when they move between schemes, between institutions, or between life stages. The Learner Passport is a user-owned digital record that resolves this. What makes it different is that it captures information the learner has gained from the process. We have a record of the books we read; why not a journal of the strategies we use?

Existing Passports vs the Learner Passport

The UK already has several disability passport schemes: the Government's Health Adjustment Passport, the TUC/GMB Model Passport, the NHS Workplace Adjustment Passport, and the AXS Passport (produced, notably, by Diversity and Ability, the collapsed company at the centre of this report's governance investigation). The Business Disability Forum found that just 11% of disabled employees said they spoke to their manager more since having a passport in place, and 17% had their adjustments reviewed less than once per year.

These passports share a common limitation: they record what adjustments the person needs. They are, in essence, a better-formatted version of the medical model, a diagnostic label with a list of accommodations attached. The Learner Passport is fundamentally different. It records what the person already knows and can do: a capability profile rather than a deficit list. It is a meaningful CV of how the learner learns, their strengths, and the strategies they have built, enabling them to carry that knowledge forward rather than repeating the same justification at every transition. This is what made the Access Card different: it made a connection with daily life rather than ticking boxes.

What the Passport Records

The Passport captures what tools the learner has tried and their experience with each; which strategies work for them and in what contexts; their preferences for learning style, communication, and support; what free and built-in tools they use effectively; where specialist tools add genuine value above free alternatives; and their confidence levels and areas where they want further support. It shares the way that during transitions in job and age, different skills are required.

The Five-Stage Approach

The Passport connects to the pedagogical model used in effective AT training practice, a conversation-led discovery approach inspired by Paulo Freire's dialogical method.

Stage	Activity	Who Leads
1	Start with the client's own phone/laptop; explore what they already use	Learner
2	Demonstrate built-in accessibility (Windows, macOS, iOS)	Trainer guides, learner explores
3	Trial versions of specialist software at learner's pace	Learner chooses what to try
4	Assess formally only if wished (neurodivergent or other PSR)	Learner decides
5	Conversation continues with ongoing support and adaptation	Partnership

International Precedents

Model	Ownership	Portability	Key Insight
Norway Brukerpass	User-held	National transfer	Removes geographical and sectoral barriers
Ireland AT Passport	Person-centred	Education to work	Acts as central connector for support ecosystem
UK Proposed Model	Individual-owned	Universal (DSA → AtW → Life)	Focuses on functional strategy over clinical diagnosis

3.5 Library CRM and Information-Sharing Systems

The UK already possesses the technical foundation for AT provision through its existing library infrastructure. Integrated Library Systems (ILS) are designed to manage complex inventories and user records, capabilities that can be repurposed for the AT Library Hub.

ILS Platform	Developer Model	Key Feature for AT Model	Strategic Advantage
Koha	Open Source (GPL v3)	SIP2/NCIP Interoperability	No vendor lock-in; removes data silos and session loss risks
Sierra	Proprietary	High-volume circulation	Established in UK consortia; reliable for scaled operations
Axiell Quria	Cloud-Based SaaS	Cloud-native asset management	Fully scalable; mobile-responsive for modern user access
Axiell Collections	Specialist Cloud	Transport/location tracking	Ideal for managing regional physical equipment pools

The SIP2/NCIP interoperability of systems like Koha provides the technical fix for the 29.7% data loss documented in the Remtek/OpenCRM proprietary silo. Open standards ensure seamless billing and record management across institutions, precisely the capability the current multi-vendor stack fails to deliver.

There is an irony in this: Capita, the company administering DSA, also owns library management system contracts. The infrastructure to fix the problem exists within the same corporate structure that administers the broken system.

3.6 Continuity of Support: How the Library Model Resolves the Cliff Edge

The Library Model's 'trial-first' approach bypasses the current ten-month AtW waiting times. Because hubs maintain shared equipment pools, employees receive

immediate interim support while applications process. The Passport ensures that employers do not need to reinvent the assessment process.

The resolution is structural: institutional licensing eliminates individual procurement waits; the Passport travels with the learner across all transitions; school to university to employment to life changes operate within one system; and the ten-month AtW wait becomes ‘walk into library, present Passport, continue.’

The Direct-Employment Economic Model

By eliminating the agency markup inherent in the five-tier cascade, the state can realise a substantial increase in service capacity. A £100,000 budget currently procures approximately 1,800 hours of support via subcontractors (after each tier takes its cut). Under the Library Hub model, the same £100,000 funds 3.5 full-time, directly employed AT specialists (including pension and desk space), providing nearly 7,000 hours of support: a fourfold increase for the same expenditure.

Section 4: The Investment Case for Libraries

4.1 Why Libraries Are the Infrastructure

The AT Library Model is not a proposal to add burden to an already stretched public service. It is a proposal to invest in libraries as national infrastructure by connecting them to a £400 million funding stream they are currently excluded from.

The Disabled Students' Allowance framework, valued at approximately £400 million over five years, currently flows through two prime contractors (Capita and StudyTech) and their subcontracting chains. The Access to Work scheme processes a further substantial annual budget through a separate DWP administration. Neither system routes any funding through library infrastructure, despite libraries already delivering digital inclusion services to overlapping populations.

Redirecting even a proportion of DSA and AtW training and support funding toward library-based delivery would achieve three things simultaneously: it would improve outcomes for disabled learners and workers by embedding support in trusted community settings; it would reduce the per-person cost of delivery by eliminating multiple subcontracting tiers; and it would provide libraries with a sustainable, ring-fenced funding stream tied to statutory entitlements rather than discretionary local budgets.

Library funding has been cut by roughly half since 2009/10, and 77% of councils cite financial constraints as their primary barrier to digital inclusion. The AT Library Model creates a revenue pathway linked to individual statutory entitlements (DSA, AtW) rather than local authority discretion. This makes library-based AT delivery financially sustainable in a way that current digital inclusion programmes are not.

4.2 What Libraries Already Deliver

Libraries are not starting from zero. Across the UK, library services already provide the components that AT support requires.

Physical spaces with digital access and assistive hardware are already in place. 1,400 libraries are already in partnership with NHS England to help people access the NHS App and other digital health tools. Islington's libraries saw physical visits increase by 6.5% in 2024–25, with online resource usage growing by 12%. Dorset's libraries recorded 949,171 physical visits and 1,567,762 total issues, with 96% of users reporting increased social connection.

Human support infrastructure already exists. Halifax's partnership with AbilityNet delivers one-to-one IT sessions within library settings: bookable appointments, Reading Spa consultations, Job Club employability sessions, and specialist access for print disabilities through CELA and NNELS. During Phase 2 of the BT Group

partnership, AbilityNet supported nearly 10,000 new learners, with a significant proportion through in-person library sessions.

Regional digital connectivity is growing. Connecting Cambridgeshire has leveraged over £160 million in supplier and government funding from a core investment of £5.8 million, achieving gigabit-capable fibre coverage exceeding 91%. Cambridge City Council awarded over £1.1 million in Community Grants in 2024–25, with Cambridge Online delivering 669 individual digital inclusion sessions and 2,200 support hours.

National strategic frameworks provide the policy foundation. Scotland's Forward strategy and Connecting Scotland programme provide a national model for device and digital skills delivery through the Scottish Council for Voluntary Organisations (SCVO). Scotland's library economic return is £6.95 for every £1 invested. England's libraries collectively generate at least £3.4 billion in social value per year.

4.3 The AbilityNet Model: Strengths and Limits

AbilityNet operates a network of 300 to 450+ Technology Volunteers across the UK who provide one-to-one support to disabled and older people through both home visits and remote access. The model is entirely volunteer-based. Volunteers are DBS-checked (Enhanced Adult Disclosure) and provide support using tools including TeamViewer for remote access, as well as WhatsApp video, Skype, FaceTime, and other platforms.

AbilityNet explicitly states that it will not accept volunteer applications for remote-only support, except where the applicant has 'specific and verifiable user knowledge of specialist accessibility software such as JAWS, NVDA, Dragon.' This means AbilityNet's remote support capability exists but is secondary to in-person delivery, the opposite of the post-pandemic assumption that everything can be done online.

AbilityNet does not employ its frontline support workers on full-time contracts. Volunteers choose their own hours and fit support around existing work and home commitments. Some volunteers have gone on to paid roles at AbilityNet, but the delivery model is fundamentally voluntary. Corporate partners including BT Group and CapGemini provide staff as part of organisational volunteering programmes.

The strength of AbilityNet's model is that it proves library-based, one-to-one AT support works at scale. The 10,000 learners supported through the BT partnership, the 8.7/10 volunteer engagement score, and the flexibility of remote and in-person delivery demonstrate that the human infrastructure component of AT support can be delivered outside the five-tier subcontracting chain.

The limitation is that volunteer-based delivery cannot guarantee consistency, availability, or specialist depth. A volunteer who fits support around a full-time IT job cannot provide the sustained, adaptive, pedagogically informed training that a DSA-funded student or AtW recipient requires. The listening, the adaptive practice, the ability to innovate within a session, the understanding of how comorbid conditions

affect learning: these are precisely the qualities that distinguish professional AT training from general digital help.

The gap the AT Library Model fills is clear. It takes the infrastructure that AbilityNet and libraries have proven works, trusted spaces, one-to-one support, remote and in-person delivery, and professionalises it. Instead of volunteers, the model embeds paid AT trainers within library settings, funded by DSA and AtW entitlements. AbilityNet's volunteers continue to deliver general digital inclusion; the AT Library Model adds the specialist, funded layer on top.

4.3.1 Corporate Social Responsibility and Governance

AbilityNet's partnership with BT Group is held up as a model of corporate social responsibility in digital inclusion. BT funds AbilityNet's volunteer programme, and corporate volunteering from BT staff forms part of the delivery infrastructure. This partnership has supported nearly 10,000 new learners and is cited in library-based inclusion strategies as evidence of effective public-private collaboration.

However, the partnership must be examined in context. Corporate social responsibility operates as a reputational asset. It does not, by itself, change the governance structures or commercial incentives of the sponsoring company. A case documented in September 2025 illustrates the structural gap between CSR rhetoric and operational conduct.

Case Evidence: BT Account LS 74016718

In February 2025, BT's sales team contacted an 89-year-old customer living in sheltered accommodation, a man who had been a loyal BT customer for over 29 years. This customer had been the victim of a sophisticated telephone fraud in December 2023, in which he was tricked into handing over bank cards and his PIN to individuals posing as police officers. Metropolitan Police officers attended his home for a three-hour interview to document the manipulation. The experience left him fearful of telephone calls and deeply ashamed.

Against this backdrop, BT used telephone sales tactics to sell him premium television channels at £15 per month, channels their own usage data would show he had never watched and would never use. His monthly charge rose to £64, compared to equivalent services available from competitors at £28–£33. This represents an 83–113% premium extracted from a customer whose vulnerability was documented in BT's own records.

The formal complaint filed in September 2025 explicitly referenced BT's AbilityNet partnership, noting that BT had 'targeted exactly the vulnerable group they claim to support through AbilityNet, violated their partner's core principles, and undermined their own corporate social responsibility commitments in pursuit of profit.'

The lesson is not that AbilityNet's work is compromised: their volunteers deliver genuine value. The lesson is that CSR partnerships cannot be relied upon as

governance. When the commercial arm of a partner company has financial incentives that directly contradict the charitable mission, the partnership becomes a reputational shield rather than a structural reform.

The AT Library Model must be built on public infrastructure and statutory funding, not on the goodwill of corporate partners whose governance structures create the very exploitation the model seeks to prevent. AbilityNet's volunteer workforce demonstrates that human infrastructure works. But the funding and governance framework must sit within the public sector, libraries funded by DSA and AtW entitlements, not within the CSR budgets of telecommunications companies.

4.3.2 Building on Volunteers: A Recognition and Reward Framework

The Two-Tier Model: Volunteers and Professionals

The AT Library Model does not propose eliminating volunteer-based digital inclusion support. AbilityNet's 450+ volunteers, library Digital Champions, and community-based helpers provide essential general digital skills support that reaches populations who would otherwise be entirely excluded. This work should be expanded, not replaced.

What the model proposes is a two-tier structure.

Tier 1: General digital inclusion (volunteer-led). Continues to be delivered by AbilityNet volunteers, library Digital Champions, and community organisations. Covers general device setup, email, online banking, form-filling, NHS App access, and basic productivity tools. Funded through existing digital inclusion streams (DSIT Innovation Fund, UK Shared Prosperity Fund, Arts Council, local authority core budgets, CSR partnerships).

Tier 2: Specialist AT support (professionally led). Delivered by paid AT trainers embedded in library settings, funded by DSA and AtW statutory entitlements. Covers specialist software training, adaptive workflow development, study skills technology integration, workplace AT configuration, and ongoing coaching. Requires pedagogical knowledge, adaptive practice, and understanding of how specific conditions affect learning and work.

The distinction is not about hierarchy but about skill and accountability. A volunteer helping someone set up email does essential work. A professional AT trainer helping a dyslexic postgraduate develop a research workflow using voice typing, mind mapping, and citation management does work that requires training, experience, and sustained engagement. Both are necessary. Only the second requires statutory funding and professional pay.

Rewarding and Recognising Volunteers

Scheme	What It Offers	AT Library Model Application
ValueYou (London)	Free discount card for 600+ businesses after 100 hours volunteering	Extend nationally for AT digital inclusion volunteers
Blue Light Card	Exclusive discounts for charity workers and eligible volunteers	Register library digital inclusion volunteers as eligible
Room to Reward	Donated unsold hotel rooms for outstanding charity volunteers	Nominate AT digital champions for milestone recognition
Leeds Library	10% discount in library shops, travel expenses, volunteer events, references	Adopt as minimum standard across AT Library Model volunteer tier
Arts Council / Know Your Neighbourhood Fund	£30m for volunteering in libraries, museums, arts groups	Link AT volunteers to arts activities in partner cultural venues
Duke of Edinburgh Award	Young volunteers (14+) can count library volunteering toward DofE	Create AT Digital Champion pathway for young people

Arts and Cultural Recognition: The Creative Health Link

The connection between volunteer recognition and arts access is not incidental. The Creative Health movement positions arts engagement as a health intervention. Social prescribing link workers already refer patients to cultural activities. Library volunteers who support digital inclusion are enabling the same health and wellbeing outcomes that Creative Health programmes deliver through arts engagement.

A volunteer recognition framework that includes discounted or free access to local arts venues, exhibitions, and performances does three things: it rewards the volunteer's contribution in a way that has genuine personal value; it connects the digital inclusion infrastructure to the cultural infrastructure, reinforcing the library's role as a community hub; and it creates a visible, tangible benefit that helps recruit and retain volunteers.

From Volunteering to Professional Pathway

The AT Library Model formalises a progression pathway from volunteer to professional.

Stage 1: Digital Champion volunteer. General digital inclusion support. Recognised through ValueYou, Blue Light Card, arts access, travel expenses, and references. Minimum commitment: flexible.

Stage 2: AT Digital Champion. Additional training in specialist accessibility tools (JAWS, NVDA, Dragon, Read&Write, ClaroRead). AbilityNet's existing specialist volunteer criteria apply. Recognised through advanced certification and enhanced reward package.

Stage 3: Professional AT Trainer. Paid role, embedded in library settings, funded by DSA/AtW entitlements. QTS-benchmarked pay scale. Requires pedagogical skill, adaptive practice, and sustained learner engagement. Professional development through the framework proposed in Section 6.

This three-stage pathway means volunteer work is not dead-end. It is the entry point to a professional career in AT support, with recognition and reward at every stage. The current system offers none of this: AT trainers enter on zero-hour contracts with no progression framework, no professional recognition, and no connection to the volunteer infrastructure that supports the same population.

4.4 Regional Models

Calderdale: The Collaborative Network

The Calderdale region provides the strongest existing example of integrated library-led digital inclusion. The library positions itself not as a standalone service but as the coordinator of a collaborative network, operating on a ‘village’ philosophy where no single organisation attempts to solve digital exclusion alone.

Services include bookable one-to-one IT sessions with staff or AbilityNet volunteers, a Reading Spa model combining literacy with digital resource navigation, Memory Kits in partnership with the Alzheimer’s Society, CELA/NNELS access for print disabilities (DAISY audio, braille, e-Text), Job Club sessions for employability, and 70 minutes of free internet daily for all members.

Halifax demonstrates the ‘warm referral’ pathway that AT support needs. A student or worker does not have to navigate the five-tier subcontracting chain; they walk into a trusted community space and receive support. The Reading Spa concept, framing technology support as part of a broader wellbeing conversation rather than a clinical prescription, maps directly onto the AT training approach described throughout this report: listening, building on what the learner already knows, experimenting together.

Devon: Employment-Focused Social Prescribing

Devon’s ‘Get Devon, Plymouth and Torbay Working Plan 2025–2027’ provides verified evidence for the connection between library-based support, employment outcomes, and disability. The plan explicitly includes co-locating employment, skills, and health services in accessible community spaces so residents can access multiple forms of support in one place; creating place-based joined-up referral and triage mechanisms so people do not have to repeat their story to multiple agencies; and piloting employment-focused social prescribing and expanding integrated health-work pathways. Devon County Council’s Reaching for Independence (RFI) programme provides tailored support to help disabled residents gain skills, confidence, and independence on their journey into work.

Wellbeing Exeter, the social prescribing project embedded within Devon's NHS commissioning framework, pairs patients with 'Community Connectors' who help them access community-based support. This model demonstrates that health-employment-digital inclusion integration is already being piloted at regional level.

Devon's relevance is specific: the RFI programme supports disabled people into work using community-based settings. Access to Work is supposed to do the same thing but through a centralised DWP process that takes 18+ months. The Devon model shows what locally delivered, co-located support looks like when it works, and the AT Library Model would connect this to AT-specific training and the AtW funding stream.

Cambridge: From Silos to Cohesion

Cambridge has historically operated a fragmented digital inclusion landscape where high-quality initiatives exist within institutional silos. The reform now underway includes the shift to multi-year community grants (£1.1 million in 2024–25, funding 81 groups benefiting 127,000 residents), the centralisation around Cambridge Online as a primary delivery partner, and the Connecting Cambridgeshire regional infrastructure programme.

The fragmentation AT trainers experience professionally, sessions booked through Calendly, managed through Remtek, invoiced through STAT Northern, paid through Capita, exists in parallel with a library-based digital inclusion infrastructure that serves some of the same population but through an entirely separate funding and delivery mechanism. The AT Library Model would connect these two parallel systems.

Scotland: The National Framework

Scotland's Forward strategy positions libraries as essential platforms for literacy, wellbeing, and community cohesion. The Connecting Scotland programme delivers devices and digital skills through the SCVO at national level. Scotland's library economic return is £6.95 per £1 invested, with annual physical footfall of approximately 40 million visits.

Despite this strategic clarity, Scotland has experienced a 16% closure rate (97 libraries) since 2008. The strategy is sound; the funding has not matched the ambition. The AT Library Model's contribution here is a revenue stream, DSA and AtW entitlements, that is demand-led and tied to individual statutory rights, not dependent on annual council budget decisions.

4.5 The Government AI Investment Paradox

Programme	Investment	Target Population	AT Equivalent?
One Big Thing 2025	Internal (60-min e-learning for all)	All civil servants	None for DSA/AtW recipients
AI Tutoring Tools	£1.8m contract (DfE)	450,000 disadvantaged pupils Yr 9–11	No disability-specific equivalent
EdTech Testbeds	£23m expansion	1,000+ schools	AT not in scope
TechFirst / TechYouth	£187m total	1m students aged 11–18	No DSA/AtW linkage
TechLocal	Regional grants	Career changers, SMEs	No disability pathway
AI Playbook (GDS)	Free (published Feb 2025)	All public sector	Not adapted for AT context
Digital Inclusion Innovation Fund	£10m+ (DSIT)	Councils, charities	Generic digital skills only

The paradox: civil servants receive free AI training. School pupils will receive AI tutoring tools by 2027. Doctoral researchers receive TechExpert funding. Career changers receive TechLocal grants. But a disabled university student must wait months for an individual assessment, receive prescribed software that may duplicate free tools, and access training through a five-tier subcontracting chain where 29.7% of session data is lost between systems.

The government already knows how to deliver centralised digital skills. It does it for every other population. The only group still receiving digital support through fragmented, per-person private procurement is disabled people. The AT Library Model proposes extending the same infrastructure logic, national licensing, library-based delivery, professional training workforce, to the population that needs it most.

4.6 AT Training as a Form of Tutoring

The DfE's AI tutoring programme is built on a specific evidence base: the Education Endowment Foundation identifies one-to-one tutoring as one of the most well-evidenced approaches for supporting pupils needing additional help. The government's framing explicitly positions AI tools as replicating 'the kind of personalised one-to-one support often only available to a privileged few.'

AT training is one-to-one tutoring. A DSA-funded AT training session involves an individual learner working with a specialist trainer to develop strategies for managing their academic work using technology. The trainer listens to the learner's specific challenges, assesses their existing skills, introduces tools and workflows adapted to their condition and learning style, and builds independence over a series of sessions.

The process requires pedagogical knowledge, adaptive practice, relational sensitivity, and subject-area understanding.

There is no structural reason why AT training should be excluded from the government's investment in tutoring infrastructure. The DfE is spending £1.8 million to develop AI tutoring tools for mainstream pupils. It is spending £23 million on EdTech Testbeds. AT training for disabled students receives no equivalent investment in tools, platforms, or delivery infrastructure: it is outsourced to private contractors and delivered by zero-hour workers earning between £14 and £35 per hour without statutory protections.

The AT Library Model would position AT training alongside mainstream tutoring as a form of supported learning, delivered by professionals in community settings, using nationally licensed tools, with outcomes tracked and fed back into system improvement. This is not a radical departure from current policy direction. It is an extension of it to the population the government claims to prioritise.

Section 5: Creative Health and the Library Model

5.1 The Creative Health Quality Framework

The Creative Health Quality Framework (CHQF), funded by Arts Council England and developed by Jane Willis in collaboration with over 200 practitioners, commissioners, and researchers, provides the quality architecture that the AT Library Model requires. Its eight Quality Principles, Person-Centred, Equitable, Safe, Creative, Collaborative, Realistic, Reflective, and Sustainable, map directly onto the values that effective AT training already embodies.

The CHQF's five-step Quality Cycle (developing your idea, building strong foundations, making detailed plans, delivering the work, and learning from the work) provides a process framework for library-based AT delivery that replaces the current system's absence of outcome measurement.

5.2 The Governance Principle: Public Infrastructure, Not Corporate Goodwill

The BT case (Section 4.3.1) and the AbilityNet analysis together establish a governance principle for the AT Library Model: public AT infrastructure must be funded by public money and governed by public accountability, not dependent on corporate social responsibility partnerships whose parent organisations have commercial incentives that contradict the charitable mission.

This does not mean rejecting private sector involvement. Corporate volunteering, technology donations, and CSR partnerships all have value. But the core delivery infrastructure, the spaces, the professionals, the software licences, the referral pathways, must sit within the statutory framework. Libraries provide this. They are publicly funded, publicly accountable, locally trusted, and already delivering digital inclusion at scale.

The current DSA and AtW model places public money into private contracting chains where governance failures are documented and structural. The AT Library Model redirects that public money into public infrastructure that already exists, already works, and already has the community trust that private contractors do not.

Libraries don't just deliver AT support better. They deliver it with governance. The five-tier subcontracting chain has no quality line, no audit trail, and no accountability for data loss. Libraries have elected councillors, public scrutiny, and the Equality Act duty. The AT Library Model is not just more efficient; it is more accountable.

Section 6: Pay and Workforce

6.1 Verified Pay Rates for AT Trainers (2025–26)

Source / Role	Hourly Rate	FTE Equivalent	Context
Jooble UK average (AT Trainer)	£16.37/hr	£33,136	Based on 79 actual salary submissions, March 2025
ERI SalaryExpert (entry level, 1–3 yrs)	£14.42/hr	£30,045	Entry-level AT trainer, employer survey data
ERI SalaryExpert (average)	£20.00/hr	£42,372	Includes bonus; skewed by London and senior roles
Glassdoor (freelance trainer avg)	£13.80/hr	£28,706	General freelance trainer, not AT-specific
STAT Northern / Remtek (zero-hour)	£26.00/hr	Variable	Documented rate; structured work, managed scheduling
Neurobox Cambridge (zero-hour)	£35.00/hr	Variable	Higher rate but unstructured; higher cognitive load
D&A / post-collapse trainers	£25.00/hr	Unknown	Confirmed rate; trainers signing on for UC post-collapse

The range across the sector is roughly £14–£35 per hour for the person who actually delivers the training. These are the verified figures from primary sources.

6.2 The Comparator: Qualified Teacher Pay Scales

Role / Band	Outside London	Inner London	Source
QTS starting salary (M1)	£32,916	£40,317	GOV.UK, Sept 2025
QTS after 5 years (approx M6)	£45,352+	£52,300+	GOV.UK, Sept 2025
Unqualified teacher (min)	£22,601	£28,342	STPCD 2024–25
Unqualified teacher (max)	£35,259	£40,994	STPCD 2024–25
SEN allowance (additional)	£2,679–£5,285	Same nationally	STPCD 2024–25

6.3 What This Tells Us

AT trainers delivering DSA-funded support operate in a pay range of approximately £14 to £35 per hour, with the modal rate for zero-hour subcontractors sitting between £19 and £26.

For context, a newly qualified classroom teacher with QTS earns a guaranteed minimum of £32,916 per annum outside London, with annual progression to over £45,000 within five years, plus statutory protections including pension contributions,

sick pay, and the SEN allowance where applicable. An unqualified teacher, someone without QTS, earns between £22,601 and £35,259.

AT trainers typically hold equivalent or higher qualifications than unqualified teachers. Many hold PGCEs, postgraduate diplomas, or specialist training credentials. Yet they are paid on zero-hour contracts without any of the statutory protections afforded to teachers, and they bear the full administrative and financial risk of system failures they did not cause.

This is the core of the workforce argument: AT trainers are doing work that requires teaching skill, specialist knowledge, adaptive practice, and relational sensitivity, but they are paid and protected at a level below that of an unqualified classroom teacher.

6.4 Professionalisation and Banding

STAT Northern Ltd operates a differentiated approach to AT trainer engagement, distinguishing between trainers with depth of pedagogical knowledge and adaptive practice, and those delivering standard software walkthroughs. This internal differentiation reflects a market reality: the skill required for effective AT training is not reducible to product knowledge alone.

The key qualities, listening, knowledge of teaching, the ability to innovate within a session, understanding how comorbid conditions affect learning, are relational and adaptive skills. These cannot be measured by checklist competencies. Any professionalisation framework must recognise this distinction.

A workforce professionalisation model for AT training should therefore adopt banding criteria that reflect pedagogical skill and adaptive practice, not solely software competency. The relevant comparator is the QTS pay framework, which already distinguishes between entry-level (M1), experienced (M6), and advanced practice (Upper Pay Range) through performance-based progression rather than tick-box certification.

6.5 Workforce Impact: D&A Trainer Experience Post-Collapse

Following D&A's liquidation (12 May 2025), the experiences of trainers in the post-collapse period document the human cost of governance failure. The evidence is drawn from a group conversation among affected trainers, used here with permission.

What the Evidence Documents

Workforce precarity after provider collapse. Following D&A's liquidation, trainers were left scrambling for continuity of work and income. AT Trainer A explicitly referenced signing on for Universal Credit. AT Trainer B described the invoicing backlog as 'a dark cloud hanging over my head.' The emotional register of the

conversation, anxiety, late-night messaging, uncertainty about next steps, is itself evidence of the human cost of governance failure.

CRM and invoicing failures are not isolated. Multiple trainers in the group reported Remtek sessions not being loaded into the system, preventing invoice submission. AT Trainer C noted this had ‘taken up to a whole week before.’ AT Trainer D chose to manually add line items rather than wait, creating exactly the kind of workaround documented in the Calendly/OpenCRM reconciliation (Section 2.4). This confirms the 29.7% data loss finding is systemic, not individual.

Scale of the subcontracting workforce. One trainer reported approximately 90 people on the Remtek round-robin system. This gives a sense of the scale of the zero-hour workforce affected by system failures and provider collapse.

Software licence abandonment risk. The conversation includes discussion of what happens to AT software licences held under D&A email accounts post-collapse. The suggestion to ‘contact individual AT providers and request they be switched over’ highlights that nobody in the governance chain planned for this contingency. Students’ access to DSA-funded software was at risk.

Desire for direct contracting. Several trainers discussed approaching Remtek directly, cutting out the collapsed intermediary. One noted Remtek ‘may just not be able to reach out to us for some type of legal/policy reason.’ This illustrates how the multi-tier contracting structure prevents the most obvious solution: connecting the people who do the work with the organisation that manages the system.

Note: All trainer names have been anonymised (AT Trainer A through D). Original records are retained with participant permission for investigation and parliamentary evidence purposes.

Section 7: Implementation and Scalability

7.1 Integration with Existing Infrastructure

University Libraries and Disability Services

Most universities already have disability services that manage DSA applications and AT recommendations. The shift is from these services acting as gatekeepers (‘apply here, wait there’) to acting as access points (‘come in, use this, get support now’). University libraries already manage technology loans, software access, and training spaces. Adding AT to their portfolio is an extension of existing capability, not a new function.

Public Libraries and Employment Hubs

For Access to Work recipients, public libraries and Jobcentre Plus locations could serve as AT access points. Many already offer digital skills training and technology access. The UK Government’s Digital Inclusion Action Plan (February 2025) explicitly recognises the role of community organisations in digital inclusion, and TechFirst (£187m, launched June 2025) includes the Lighthouse Futures Trust project specifically for SEND learners. Equipping public library hubs with AT tools and trained staff extends the Library Model beyond higher education into employment support.

Currently, Job Centres are paying commercial JAWS subscription rates for public terminals, an exploitation of public funds when free, built-in screen readers could serve the same function. The Library Model replaces per-seat specialist licensing with institutional accessibility infrastructure.

There is a deeper reason to locate AT support in libraries rather than Job Centres. The Job Centre environment is structured around closed questions and medical-type justification: ‘What have you done this week to look for work? Why did you miss your appointment? What is your condition?’ Work coaches operate under performance targets that incentivise throughput over conversation. For a neurodivergent person, this environment replicates the same clinical gatekeeping that the DSA assessment model imposes.

A library is a different space entirely. Libraries are information centres where people already go to learn, explore, and access digital services. There are no closed questions at the door. The apps and digital resources are already there. By locating AT support within library infrastructure, the stigma of the Job Centre, with its associations of surveillance, conditionality, and deficit-based interaction, is replaced by an environment where learning is self-directed and support is available without justification. This is not merely a practical advantage; it is a structural application of the Social Model. The environment enables participation rather than gatekeeping it.

Employer Partnerships

Larger employers could hold their own AT licences as part of workplace adjustments budgets, with the Library Model providing a public fallback for SMEs and gig economy workers who lack in-house occupational health resources.

7.2 Policy and Reform Requirements

DSA Reform

The reforms required for DSA are structural. Shift DSA funding from individual procurement to institutional infrastructure grants: instead of funding 1,000 individual software licences, fund the university's site licence. Instead of funding 1,000 needs assessments for the same standard toolkit, fund universal access and reserve individual assessments for genuinely complex cases. Create library exploration sections enabling learners to trial tools before procurement. Remove the diagnosis requirement for standard AT access. Abolish the two-cancellation rule and replace it with a mix of workshops, remote sessions, and drop-in availability.

Access to Work Reform

Create continuity between DSA and AtW via the Learner Passport. Reduce processing times through the infrastructure model. Fund infrastructure, not just individuals. The Passport ensures that a graduate entering employment does not restart from zero.

Technology Standards for Contractors

Where individual provision remains necessary, minimum technology standards should be established for prime contractors. This applies equally to DSA and Access to Work delivery.

Standard	Requirement	Current Status
System uptime	99%+ for booking and CRM systems	No standard exists
Data accuracy	95%+ match between integrated systems	29.7% data loss documented
Audit trail	Full tracking: booking → delivery → payment	Black box to trainers
System failure penalties	Contractor liability for data loss	Trainer bears all risk
Zero-hour protections	Compensation when systems fail	No provision exists

Minimum Standards for Assessment

Assess free and built-in alternatives before specialist procurement. Require cost-benefit comparison: subscription versus perpetual versus free. Mandate usage tracking and abandonment reporting. Conduct annual value-for-money review of all

funded software. No specialist software should be prescribed without first establishing that free or built-in tools are inadequate for the learner's specific workflow.

Governance Accountability

SLC must hold contracts with providers (currently holds none). DfE must establish baseline approval criteria (currently inherited without documentation). Universities must conduct due diligence regardless of contract value. Enforcement must exist for provider violations (currently rules without consequences). Funding must be redistributed from individual grants toward infrastructure investment.

7.3 Cost-Benefit Summary

Factor	Current Model	Library Model
Access speed	Months (diagnosis → assessment → procurement)	Immediate (walk in, use tools)
Admin cost per student	High (5-tier chain × individual processing)	Low (one-time infrastructure setup)
Software licensing	Individual licences per student	Institutional bulk licences
Hardware waste	Per-student procurement; often unused post-graduation	Pooled, reused, maintained centrally
Training delivery	5 sessions × 5-tier contracting	Ongoing drop-in + specialist appointments
DSA → AtW transition	Total restart; 10-month wait	Continuity via Learner Passport
System failure risk	29.7% data loss (documented)	Centralised, visible, fixable
Neurodivergent accessibility	High cognitive load; rigid policies	Low barrier; flexible access
Outcome tracking	None (no usage/abandonment data)	Built into Passport and library CRM
Subscription costs	Escalating (double subsidy pattern)	Bulk institutional or free alternatives first
Governance accountability	None (SLC holds no contracts)	Normal public service accountability

Section 8: Truthfulness Audit

This section cross-references official policy statements about the Disabled Students' Allowance (DSA) and Access to Work (AtW) schemes against documented outcomes drawn from Freedom of Information responses, National Audit Office data, frontline delivery records, and systematic CRM system failure evidence.

The audit applies a simple rating system. RED means stated policy is directly contradicted by documented evidence. AMBER means intent is present but delivery falls materially short. GREEN means stated policy broadly matches actual outcome.

Methodology

Documents were classified into three categories. Official policy and guidance documents constitute the stated policy baseline. Freedom of Information responses constitute the actual outcome evidence. Case evidence from frontline delivery, CRM system analysis, and provider ecosystem review constitutes supporting data. Each claim in the audit table was verified against primary sources. The verification checklist is maintained separately and records the status of all data points as of March 2026.

A Note on JAWS, Dragon, and the AbilityNet Model

This audit takes a pragmatic approach to specialist software. JAWS remains the industry standard for professional screen reader users, and Dragon Medical offers genuine specialist clinical vocabulary. These tools have legitimate specialist roles. However, both face recurring compliance issues with operating system and browser updates, and the subscription model forces ongoing public expenditure regardless of whether the learner continues to need the tool. The assessment process should evaluate built-in alternatives first and demonstrate that specialist procurement adds value above what is already available at no additional cost.

Similarly, the AbilityNet volunteer model proves the concept of community-based AT support at scale, and should be built upon rather than replaced. But a national system cannot rely on goodwill alone. The interactions with clients in complex support scenarios require professional consistency that volunteer availability cannot guarantee. The mixed approach, volunteer-led general digital inclusion as Tier 1, professionally delivered specialist AT as Tier 2, is the correct model. It cannot be allowed to become a shortcut on funding. As this report demonstrates, common sense has been consistently absent from governance.

Truthfulness Audit: Stated Policy vs Documented Outcome

Stated Policy	Documented Outcome	Rating	Source
AtW decisions within 24 weeks	Average 109 days; backlog 62,100; case V3L6OJLX waited 18+ months	RED	NAO HC 1644; DWP correspondence
SLC provides assurance suppliers are vetted	SLC does not undertake due diligence on NMH providers	RED	SLC FOI response
DfE audits ensure provider quality	DfE rated D&A 'satisfactory' 10 months before collapse (£648k owed)	RED	DfE FOI 2025-0043604
Universities use approved suppliers	No due diligence for low value suppliers (Imperial College London)	RED	Imperial FOI; ICO IC-480494-R5H0
DSA assessment ensures correct equipment	£4,523 prescribed; free M365 tools actually used by learner	RED	AT trainer records; AtW grant ref 100680930
Technology stack supports delivery	29.7% data loss between Calendly and OpenCRM documented	RED	November 2025 CRM reconciliation
Timms Review will inform policy	PIP 4-point rule inserted into Bill before review concluded; removed under pressure	RED	Parliamentary record; IFS analysis
AtW staffing increase will reduce backlog	Staff doubled (247 to 588); backlog grew 186%	RED	NAO HC 1644
Free AT tools are inferior to specialist	M365 voice typing uses same engine as Dragon (£600+/yr); JAWS and Dragon Medical retain genuine specialist value in specific cases	AMBER	Microsoft documentation; procurement records; frontline observation
Data gaps limit FOI responses	Data gaps are themselves primary evidence of governance failure	RED	Multiple FOI 'information not held' responses
Platform providers offer adequate AT documentation	Feature-level documentation only; no workflow guidance; 26-year pattern across all three platforms	RED	Apple Support (2026), Google Accessibility Help (2025), Microsoft Support (2025)
DSA assessment process is independent of supply chain interests	Sight and Sound holds 25–50% PSC over StudyTech; shared directorship and registered address; sole UK distributor controls DSA regional provider	RED	Companies House PSC records (Company 14762480)
JAWS/Dragon remain essential specialist tools	Both face compliance issues with updates; subscription model forces ongoing cost; Dragon now owned by Microsoft yet charged separately	AMBER	Sight and Sound pricing Sept 2025; Microsoft Nuance acquisition records
AbilityNet volunteer model provides adequate specialist support	Proves concept but cannot guarantee consistency, availability, or pedagogical depth; cannot rely on goodwill alone	AMBER	AbilityNet volunteer application policy; BT partnership data

Eleven of fourteen audited claims receive a RED rating: stated policy is directly contradicted by documented evidence. The three AMBER ratings reflect claims

where the intent has some basis in specific use cases, but the blanket assumption is not supported by the evidence of actual learner workflows and system operation.

The principle running through this audit is that data gaps are themselves evidence. When SLC cannot report assessment costs across its accounts, when DWP holds no KPI data for AtW outcomes, and when DfE holds no original approval criteria for the providers it oversees, the absence of data is not a limitation of the FOI process. It is primary evidence of governance failure.

Key Metrics: The Scale of Failure

Metric	Figure	Source
AtW processing time increase	289% (28 days to 109 days)	NAO HC 1644
AtW decision backlog increase	186% (21,700 to 62,100)	NAO HC 1644
AtW outstanding payments increase	359% (6,900 to 31,700)	NAO HC 1644
AtW staffing increase (same period)	138% (247 to 588 FTEs)	NAO HC 1644
AtW annual expenditure	£321 million (2024–25)	NAO HC 1644
CRM data loss rate	29.7% (11 of 37 sessions)	November 2025 reconciliation
D&A collapse: owed to creditors	£648,000	Companies House
D&A collapse: owed to disabled workers	£193,000 (100+ associates)	Liquidation documents
Equipment prescribed but unwanted	£4,523 per case (documented)	Trainer records; AtW grant ref 100680930
DSA contracting tiers	5 tiers before reaching learner	Operational evidence
JAWS subscription (annual)	£420/year vs £0 NVDA	Sight and Sound Technology Sept 2025
Dragon Professional (annual)	£600–£1,200/year vs £0 M365	Market pricing 2026
AtW application denial rate increase	22% increase; 1 in 3 now denied	NAO HC 1644
Private diagnosis cost (gateway)	£350–£600	Current market rates
Fiscal return per £4,000 AtW grant	£18,000/year (4.5x ROI)	AT economic return research

Six Types of Governance Failure

Failure Type	Institution	Evidence
No accountability infrastructure	SLC	Does not undertake due diligence on NMH providers
Inherited without baseline	DfE	Approval criteria inherited from DSA-QAG (2019) without documentation
Regulations permit gaps	Imperial College London	No due diligence for low value suppliers
Internal dissent ignored	SLC/DfE	‘Outrageous’ comment documented in SLC Operational Group minutes (15 May 2025) but approval proceeded
Violations without enforcement	CAM	Logos of seven institutions displayed without authorisation; no consequences until FOI process became the accountability mechanism
Tick-box compliance	Goldsmiths	‘Only uses DfE-approved suppliers’ equals no independent checking

Conclusion

The evidence collated in this document, drawn from frontline operational experience, 12 Freedom of Information responses, NAO audit data, and systematic CRM system failure documentation, demonstrates that the current model of disability support technology provision is failing the people it is designed to serve. It is too slow, too complex, too fragile, and too expensive relative to what it delivers.

The failures are not anomalies. They are structural features of a system built on medical model assumptions and 20th-century bureaucratic logic. The 29.7% data loss rate, the ten-month Access to Work waiting times, the five-tier contracting chain, the rigid two-cancellation policy, the £4,500 of prescribed equipment that goes unused while free tools do the job, the 289% increase in processing times despite doubled staffing, the approval of a provider one day before a £648,000 liquidation: these are symptoms of a system that treats disability as an individual problem requiring individual solutions, when the evidence points clearly toward environmental and infrastructure-level answers.

The fiscal case is unambiguous. Research into the economic return of assistive technology demonstrates that transitioning a disabled individual from welfare reliance to full-time employment generates a fiscal return of approximately £18,000 per year through tax revenue and benefit savings. A £4,000 Access to Work grant that prevents someone falling out of work saves the state £18,000 annually: a 4.5x return on investment. The question is not whether AT provision is affordable; it is whether the current procurement model wastes most of the investment before it reaches the person it is meant to help.

The AT Library Model is not radical. It applies the same principle that has made public libraries one of the most effective and enduring public services: make the tools available to everyone, reduce barriers to access, and invest in shared infrastructure rather than individual transactions. It starts with the phone in the learner’s pocket, builds through conversation, and carries forward through a Learner Passport that ensures no transition forces a restart from zero.

This approach could be extended to serve learners from age 16 onwards, enabling young people to access AT support through the same library infrastructure that already serves their communities. It could also create skills centres within libraries that respond to the specific needs of each area, recognising that rural communities have different requirements from urban centres, and that local AT support should be shaped by the people who use it, not prescribed from Whitehall.

This report is anti-architecture, not anti-provider. Genius Within, Neurobox, Thriiver, and the individual AT trainers working through STAT Northern and Remtek do skilled, committed work. The system they operate within wastes their expertise and exploits their precarity. A better-designed system would let them do their best work.

The question is not whether this approach would work. It is whether policymakers have the courage to stop fixing the person and start fixing the environment.

Document completed: March 2026

Evidence verification: 100% complete against primary sources (see Appendix B)

Audit rating: 11 RED, 3 AMBER, 0 GREEN of 14 audited claims

Ready for: Policy submission, parliamentary briefing, multi-audience distribution

Afterword: Why This Report Exists

I first encountered this system in 1999, when a dyslexia assessment during my PGCE in Art and Design at Central Saint Martins the diagnosis introduced me to assistive technology, but this was before the EqualityAct and I was deemed not worthy so that option was not given. In 2010, I received an Access to Work grant. The equipment that arrived did not match my needs. The assessment and one day of training ignored the strategies I had already developed and I was given limited options and talk at . Fifteen years later, the same pattern persists in the way the learner is assessed.

For seven years I have worked as an assistive technology trainer, supporting students under DSA and workers under Access to Work. I have seen, from the delivery end, how the five-tier chain functions: the zero-hour contracts, the 29.7% data loss rate, the prescribed equipment that sits unused while free tools do the job. I have also seen what works. The conversation with a learner that unlocks a strategy they'll use for the rest of their career. The moment someone realises their phone already does what a £2,000 piece of prescribed software was supposed to do.

In 2025, D&A, the provider I had worked through, went insolvent. Over 100 predominantly disabled associates were left unpaid. Thousands of students lost support. The directors formed Calling All Minds and began operating in the same space without checks or consequences. As a zero-hour worker with no obligation to do so, I submitted twelve Freedom of Information requests to the institutions listed on the CAM website, to make them aware of the history and challenge their association with a company that had a record of poor governance. The FOI process itself became the accountability mechanism. No institution had noticed independently.

This report examines the gaps left by Microsoft, Google, and Apple in explaining their own accessibility features. It documents how those gaps have been filled by companies now owned by private equity firms, operating under contracts that track neither the quality of service delivery nor the costs passed to the disabled people and taxpayers they are supposed to serve. It questions how a company that is both supplying equipment and delivering training was able to secure a 50% stake within the delivery of DSA.

The tools are there. The knowledge is there. The practitioners are there. What is missing is a system that puts these together in a way that actually works for the people it is meant to serve.It need process with a conversation with AT trainer with knowledge and it need to be accessible for the transition we have in life

Appendices

Appendix A: FOI Response Summary

Twelve Freedom of Information requests were submitted to government bodies, universities, and public agencies between 2025 and early 2026. The following summarises what was asked, what was disclosed, what was refused, and what each response reveals.

Institution	Key Disclosure	Key Refusal / Gap	Governance Finding
SLC	'Does not undertake due diligence'	Cannot report assessment costs across accounts	No accountability infrastructure
DfE	D&A rated 'satisfactory' pre-collapse	No original approval criteria held	Inherited without baseline
Imperial College	'No due diligence for low value suppliers'	Section 43(2) exemption for contract details	ICO complaint in progress (IC-480494-R5H0)
UCAS	Refused disclosure entirely	Brand protection 'outside designated function'	ICO complaint in progress (IC-480538-W2B6). UCAS DSA page states 'Content provided by Calling All Minds'
RCA	SLC minutes: 'outrageous' comment	Full minutes not disclosed	Internal dissent documented
Goldsmiths	Suspended CAM from supplier system	Acted only when challenged by FOI	Reactive governance
Cambridge	Denies CAM relationship	No monitoring of former contractors	Brand unprotected
TfL	Confirms no CAM relationship	Logo used without authorisation	No consequences for violation

Appendix B: Verification Checklist

All data points in this document have been verified against primary sources. The verification status as of March 2026:

Thread	Data Point	Source for Verification	Status
Subscription Trap	JAWS £995 perpetual / £420 subscription	Sight and Sound Technology (Sept 2025)	Verified
Subscription Trap	Read&Write DSA perpetual £385	AT product pricing 2026	Verified
Subscription Trap	DSA £27,783 allowance (England 2025/26)	GOV.UK / Disability Rights UK	Verified
Equipment Mismatch	NHS VI client costs (£2,138 + £2,097)	Trainer records + AtW grant letter (ref. 100680930)	Verified (two sources)

Equipment Mismatch	CRN 30380432312 faulty equipment	Trainer records	Verified
D&A/CAM	D&A owed £648,000 / £193,000 to workers	Companies House liquidation documents	Verified
D&A/CAM	CAM Company 16330062; registered 20 March 2025	Companies House	Verified
D&A/CAM	Logos removed from CAM website	Screenshot evidence / web archive	Verified
DWP Process	Postal-only rule (January 2026)	Email correspondence	Verified
DWP Process	V3L6OJLX timeline dates	DWP correspondence	Verified
Timms Review	PIP 4-point rule removed at second reading, 1 July 2025	Parliamentary record; House of Commons Library	Verified
Timms Review	IFS savings analysis	IFS publications (July 2025)	Verified
Learner Passport	£350–600 private diagnosis cost	Current market rates	Verified
Workforce	£26/hr Remtek vs £35/hr Neurobox rates	Contracts	Verified
NAO HC 1644	All four metrics (289%, 186%, 359%, staffing doubled)	NAO report February 2026	Verified

Appendix C: Sources and Evidence Base

Primary Evidence (Author-Generated)

Documented CRM system failures (November–December 2025); frontline AT training delivery records (2018–2026); DSA/Capita/SLC operational procedures (observed through service delivery); Access to Work application data (case V3L6OJLX); Remtek/STAT Northern/Calendly integration evidence; FOI requests and responses (12 institutions, 2025–2026); Access to Work grant letter (ref. 100680930, January 2025, used with permission of Christopher Pimlott, Head of MH Strategic Commissioning, NHS Greater Manchester Integrated Care).

Government and Audit Sources

National Audit Office, Access to Work, HC 1644 (February 2026); DfE AI Safety Standards for Educational Settings (January 2026); UK Government AI Playbook (February 2025); UK Digital Inclusion Action Plan (February 2025); TechFirst Programme (£187m, June 2025); DBT Microsoft 365 Copilot Evaluation (August 2025).

Academic and Policy Sources

Phillips, B. and Zhao, H. (1993) ‘Predictors of Assistive Technology Abandonment’, Assistive Technology, 5(1), pp. 36–45; Le Cunff, A.-L. et al. (2024) ‘Cognitive Load and Neurodiversity in Online Education’, Frontiers in Education; CAST (2024) Universal Design for Learning Guidelines 3.0; Freire, P. (1970) Pedagogy of the Oppressed; Harrison, M. et al. (2024) ‘Neurodiversity and Digital Inclusion’, University of Melbourne/SMART Technologies.

Sector and Journalism Sources

Kale, S. (2020) ‘The battle over dyslexia’, The Guardian, 17 September (ISSN 0261-3077); Thomas Pocklington Trust sector reporting; Disability News Service reporting on Minister Timms; Business Disability Forum (2023) research on disability passport effectiveness; ACAS (2025) neurodiversity guidance; CIPD (2024) neuroinclusion at work report; Birkbeck (2023) neurotypical privilege research.

Case Evidence

DWP Formal Complaint — V3L6OJLX (September 2025); MP Complaint Letter — DWP Access to Work Delays; ICE Complaint DWP07769/25; CRM System Failure Case Study (December 2025); Evidence Depth Annex (7 verified threads, March 2026).

Appendix D: FOI Question Sets for Market Dominance Investigation

The following question sets are designed for conversion into FOI requests targeting provider concentration within the DSA and Access to Work delivery architecture. They name specific providers to ensure responses address actual market structures rather than generic policy descriptions.

1. Named Providers and Contract Scope (DSA). Which contracts have been awarded to Capita and StudyTech for DSA, assistive technology, needs assessments, and training delivery? What services does StudyTech deliver directly versus via subcontract? How does the commissioning body distinguish assessment, equipment supply, and training functions? Are services delivered by organisations that are financially linked, contractually dependent, or operationally integrated?

2. Business Model and Incentives. How are Capita and StudyTech remunerated? What incentives drive standardisation, limited assessment time, or reducing follow-ups? How is ‘value for money’ defined? Are outcome measures focused on delivery, budget, or user benefits?

3. Assistive Technology Training Market. Which companies are approved under DSA and Access to Work? How often are training providers engaged across regions? Are training providers affiliated with specific products or vendors? What share of public training funding goes to frequent providers versus independent ones?

4. Captioning and Transcription. Which captioning and transcription providers are routinely used? Are these services bundled or procured separately? How is their effectiveness evaluated beyond initial access or compliance?

5. Access to Work: Needs Assessment Providers. Which organisations deliver assessments? What proportion of assessments are done by each provider? What training do assessors receive? How is assessor performance evaluated?

6. Targets, Throughput, and Outcomes. Are assessors required to meet assessment quotas or cost benchmarks? How many follow-up sessions are typical per recipient? Is there review of whether recommendations remain in use after 6–12 months?

7. Cross-Provider Relationships and Market Dynamics. What contractual or informal links exist between assessment, assistive technology, training, and captioning providers? Do the same providers dominate DSA, Access to Work, and education sectors? How does provider concentration impact innovation, personalisation, and user choice?

8. Public vs Private Sector Outcomes. Do current models prioritise process compliance, budget certainty, or throughput? How much discretion do assessors and trainers have to customise or depart from standard packages?

Appendix E: AT Product Pricing Comparison

Product Category	Specialist Product	Specialist Cost	Built-In Alternative	Built-In Cost
Screen reading	JAWS Professional (subscription)	£420/year	NVDA / Windows Narrator	£0
Speech-to-text	Dragon Professional	£600–1,200/year	M365 Dictation / Windows Voice Typing	£0 (with M365)
Literacy support	Read&Write (DSA perpetual)	£385	M365 Immersive Reader	£0 (with M365)
Captioning	Caption.Ed Pro (3-year AtW)	£2,097	Microsoft Teams Transcription	£0 (with M365)
Screen magnification	ZoomText Fusion Professional	£2,138	Windows Magnifier / macOS Zoom	£0
Note-taking	Genio Notes (3-year AtW)	£1,125–1,500	OneNote + M365 Transcribe	£0 (with M365)
Mind-mapping	Ayoa Ultimate	£156/year	Microsoft Whiteboard / FigJam	£0 / Freemium

Note: Built-in alternatives are not always functionally equivalent to specialist products. JAWS remains superior for professional screen reader users; Dragon

Medical offers specialist clinical vocabulary. The point is not that free tools replace all specialist needs, but that the assessment process should evaluate built-in alternatives first and demonstrate that specialist procurement adds value above what is already available at no additional cost.

Appendix F: Certification as Documentation Failure

This appendix contains the detailed evidence on formal certification models referenced in Section 1.3.3. It documents how the feature-identification problem in platform documentation scales up into qualification frameworks.

Microsoft extends the documentation gap into formal education and certification. The Microsoft Digital Literacy programme no longer requires assessment to validate skills: learners simply receive a Certificate of Completion after finishing each module. When Microsoft migrated its Digital Literacy curriculum to LinkedIn Learning, it disrupted educators mid-semester, redirected students to a social media platform blocked by school administrators, and removed the previous curriculum without adequate notice.

The ECDL/ICDL model that Microsoft's certifications parallel, established in 1995, tests knowledge through a simulated Windows/Office environment where mouse movements and keystrokes are monitored. It measures whether a user can find a menu item, not whether they can integrate that tool into a working process. This is the documentation problem scaled up into formal qualification.

In 2026, Microsoft Certified Professionals continue to struggle to translate certifications into employment because the gap between theoretical knowledge and practical, job-ready skills persists. Microsoft has responded by introducing 'Applied Skills', shorter scenario-based assessments, which tacitly acknowledges the failure of the certification model but remains oriented toward IT professionals, not the everyday user.

The relevance to AT provision is direct. DSA needs assessments operate on the same logic as the ECDL: identify the feature, confirm the learner can locate it, tick the box. The assessor's checklist mirrors the certification framework's simulated environment. Neither measures whether the learner can integrate the tool into their actual working process. The Library Model's conversation-led approach replaces this tick-box logic with adaptive, workflow-based assessment that starts from the learner's existing capability.

Note: The CRM System Failure Case Study referenced in Section 2.4 is available as a companion document (previously Appendix F in earlier drafts, now redesignated Appendix G).