



DAWN Submission to the HEA National Access Plan 2022-2026

What should our overall vision for equity of access to higher education in Ireland be for 2022-2026?

We recommend that the new National Access Plan:

- Shifts the focus from access to inclusion where HEIs are tasked with providing a supportive learning environment that ensure students have the necessary resources/supports to reach their full potential.
- Ensures that HEIs and their associated courses/curricula and assessments are equitable and accessible to students who can demonstrate course competencies.
- Actively supports the mainstreaming of support throughout the university so that access is everyone's business.
- Recommends a Universal Design for Learning approach be used throughout higher education to ensure HEIs are inclusive.
- Addresses the shift towards blended learning, which Covid19 has served as a catalyst for. Opportunities to study flexibly allow some students with disabilities to engage in third level study which would otherwise be inaccessible to them. Flexible provision should be actively supported to address the needs of many of our access cohorts.
- Tasks HEIs with auditing and reporting on the barriers, challenges, and difficulties that students from underrepresented groups face in both accessing and participating in Higher Education. Barriers should be identified at every step of the disabled student journey, and they should be removed or minimised.

Who are the target groups that should be specified in the next National Access Plan?

- The last Access Plan focussed primarily on participation in full time under-graduate study. The next plan should promote the participation by students from the designated target groups at all levels of education – students with disabilities are



notably under-represented at post-graduate level and are less likely to be employed than non-disabled graduates.

- The focus should be shifted from entry to the full college experience, ensuring that students with disabilities have the same opportunities to participate in all aspects of college life including; ability to live on campus in appropriate accommodation, study abroad/Erasmus, placements and internships, clubs and societies etc.
- Students with disabilities, in particular those with significant physical and sensory disabilities, with a specific target for ISL (Irish Sign Language) users (i.e. those persistently underrepresented in Higher Education). This requires a wholistic approach to access and inclusion across the education sector as many barriers are experienced at primary and secondary education.
- Target groups should not only be those groups that are under-represented at the point of entry, but also those students and groups who are at most risk of not progressing. Learners returning from prolonged periods of hospitalization/rehabilitation/off books or medical repeat – should be provided with specialist support. These are students with mental health difficulties, autistic students, and D/deaf students.
- Those who are marginalised with less educational capital e.g. carers, stay at home mothers, people with significant social or mental health difficulties and students with multiple levels of disadvantage.

How can pre-entry and post-entry activities be developed for students with disabilities?

- Existing disability and access activities should be reviewed for effectiveness. This requires the development of an agreed set of metrics to track pre-entry activity and the impact of outreach interventions.
- A national outreach and pre-entry approach is needed to reduce the current duplication of effort and to encourage collaboration across the sector. The goal should be access to Higher Education and not competition between institutions.
- The new National Access Plan should advocate for 'bonus points' approach for supplemental entry routes, including DARE. Like the 'bonus points' awarded for Higher Level Maths. This would assist with fostering a sense of belonging for students, some of whom feel they are entering college on the back foot due to having received a 'reduced-points' offer. There is also stigma associated with these entry routes because of this.



- Disabled/Neurodivergent bridge support programmes for second to third level. Connection to third level within the senior cycle is imperative to the overall development and transition for students with disabilities. Often students have come very well supported from second level, and have had the support of SNAs, extra tuition, etc and find it hard to independently manage their social, academic, and personal wellbeing effectively during this transition.
- The emphasis should be shifted from access to participation and progression. The focus needs to be on engagement, the student experience, and academic outcomes.
- College Career Services should provide additional supports for disabled students to support them post-graduation and into employment. Links should be enhanced between colleges and employers to support this.
- Recognise the role of mentoring, the student voice, and seeing students achieve from similar backgrounds.
- Alongside student advocacy and mentorship, students with disabilities should have many opportunities to engage in all activities which may enhance their personal, educational, and career development throughout their time in college and beyond. At present, there are limited supports available to students with disabilities to support them with their progression and engagement in activities associated with the development of employability skills necessary to excel in the workplace beyond graduation, and limited availability of supports which may guarantee a successful transition and continuous development for students with disabilities engaging in international mobility.
- Specialist services should not be relied on, to support the increasing student numbers. This is particularly pertinent in the case of students with disabilities: the continued growth in such students warrants a whole-university approach. UDL where it has been introduced has shown that such practices benefit everyone and not just those with students diagnosed disabilities.
- The costs of accommodation must be addressed for students with disabilities who require the support of a Personal Assistant. Currently these students must finance the cost of a room for themselves and their Personal Assistant. This places some of the least-represented students in higher education, for which targets have been set, at a significant disadvantage.
- The National Access Plan should focus more specifically on key stages and transitions of the student journey, particularly for students with recognised difficulties in these areas e.g. neurodiverse students.



- The European Commission country Report for Ireland 2019 revealed that Ireland has one of the lowest employment rates for people with disabilities in the EU (European Union) (26.2 % compared to 48.1 % in the EU in 2017). Ireland also has one of the highest gaps between people with and without disabilities (45.1 percentage points) in employment.
- There is currently no first destination data from the HEA (Higher Education Authority) giving information on progression to employment for people with disabilities in the most recent 2 years. Students with disabilities experiencing barriers in this area was evident in the data from previous years' reports. In 2018, 'disability and health reasons' were highlighted by approximately 13% of graduates who were engaged in 'other' activities (and not in employment) in the 9 months following graduation.
- This low rate of employment and progression onto employment after graduation among people with a disability is of concern. Apart from restricting their participation in society it also ties them into state-dependent low-income situations. Therefore, it is not surprising that Ireland's poverty figures reveal that people who are ill or have a disability are part of a group at substantial risk of poverty.

How can current funding programmes be better utilised to further the objectives of the National Access Plan?

- Build accountability into the funding streams. HEIs should be accountable (via FSD for example) for embedding UDL into programmes and comprehensive plans with measure goals and targets.
- Ensure overall FSD national funding increases in line with increase in number of students registering for disability support and increase in complexity e.g. multiple disabilities, increase in those registering under mental health category. Permanent posts should be established to support those students who will require specialist supports.
- Current funding does not do enough to consider individual circumstances e.g. students on healthcare courses are required to fund travel for compulsory placements, students that have caring responsibilities and have to fund childcare, students who have to work to continue in study but are penalised for studying part-time, extra costs associated with disability etc. We recommend that the SUSI system is enhanced to support the participation of students from the designated target



groups, at both undergraduate and postgraduate levels, on either full-time or part-time basis.

- Greater flexibility is needed in the SUSI grant for students repeating a year of their course due to medical and disability reasons. Many students are offered the support of a SUSI grant for the duration of their studies on the understanding that those from socio-economic disadvantaged backgrounds face additional barriers in accessing Higher Education. However, if a student takes a year out of their studies due to a health or a disability issue, SUSI really lets them down because they cannot afford to continue in Higher Education without the continued support.

How can the goal of mainstreaming be further embedded within HEIs?

- The National Access Plan should actively support and monitor the implementation of a whole-institution approach to access and inclusion.
- A Universal Design for Learning approach should be promoted throughout higher education to embed access and inclusive practice.
- The National Access Plan should support a sector-wide development and implementation of a Universal Design professional development programme for all faculty and staff.
- Data collection and monitoring that enable the implementation of mainstreaming to be tracked and reported on, including the number of staff trained in the principles of Universal Design, student feedback, and the development of Mainstreaming Implementation Plans.
- Widening Participation Committees should be established in each institution, containing senior figures from across the institution who can affect change.
- The Covid pandemic demonstrated that online learning was possible for some instructional events, for blended learning to be successful and for assessments to be reimaged. The good things from the Covid pandemic, could be kept and used to assist with the goal of mainstreaming within HEIs.
- Procurement of all IT (Information Technology) products via national frameworks such as VLE's should ensure they have been accessibility checked so that they can be used equally by all students.



How can a whole-of-education approach to widening participation in higher education be achieved?

- There needs to be specific accountability within Schools and Programmes. This requires robust data sets showing individual programmes how they are doing against national targets and where work is required. Institutional data does not reflect this and can lead to underrepresented students being well-represented in some disciplines and grossly underrepresented elsewhere.
- UDL must be embedded in HEI's teaching and learning strategies.
- Actively support the appointment of key people to ensure delivery on accessibility requirements e.g. campus accessibility, Teaching & Learning, the European Web Accessibility Directive. The sector must move away from seeing accessibility matters as the responsibility of student disability support services.
- A whole-education approach to widening participation should begin from pre-school. Communities require role models, to be shown possibilities and the parents of children need to be supported. Initial career guidance should improve pre-second level so that children make informed choices at Junor Cycle that do not limit their progression options at CAO.
- A whole-of-education approach is needed to track and monitor students from primary level and throughout their education.
- Higher Education Institutions have an opportunity to instigate a discussion with stakeholders in secondary education (DES, NCCA (National Council for Curriculum and Assessment), CAO (Central Admissions Office), State Exams etc) about the rigid and one-dimensional delivery of teaching and learning which does not equip most students for higher education, and directly excludes others. A whole of education approach to widening participation should focus on the full student journey from engaging with potential applicants to access, continued supports while in education and support in the transition to further study or employment.

How can pathways between further education and training and higher education be better developed?

- Pilot a system which would allow FE learners to participate in a first-year module within a local HEA relating to their current course. The student would retain this award and use it towards their third-level qualification. This would make assist with



the transition to higher education from further education as students would have a lighter workload.

- The next National Access plan should articulate a clear structure for the collaboration between FE and HE, led by SOLAS and the HEA.
- Pilot and fund joint foundation programmes which would use the expertise of both FE and HE sectors.
- More transition programmes should be developed for students who will find transition to university more difficult, and partnerships were blend of FE-university classes should be encouraged.

What challenges has Covid-19 presented in relation to an inclusive higher education system and how can they be addressed?

- COVID-19 has demonstrated the merits of flexibility. Those students for whom full-time engagement in higher education is not an option due to work, family commitments, disability or health factors, have demonstrated that they can engage remotely. This illustrates the potential of a flexible higher education provision that address the need of those for whom previous provision was a barrier to access. The National Access Plan should support the continuation of a flexible approach to accommodate students with a need to learn remotely.
- Inclusive curriculum design is essential for creating inclusive online content and upskilling of all faculty and staff is required.
- Covid has shown the relative inaccessibility of many of our online learning platforms. The need for standardisation in relation to the provision of lecture recordings, captions and mainstreamed Assistive Technology solutions is crucial to ensure that students with disabilities (and many others) can participation on an equal footing to their peers.
- There is a 'digital divide' among students who have unequal access to technology (including WIFI and space and time to study productively) and the financial wherewithal to access books where these are not available / accessible in the library.