



Written Submission on National Plan for Equity of Access to Higher Education (2022-2026)

June 2021

The Union of Students in Ireland (USI)

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level Students' Unions in Ireland. Founded in 1959, USI now represents more than 374,000 students in Further and Higher Education Colleges across the island of Ireland. The goal of USI is to work for the rights of students and a fair and equal post-secondary education system in Ireland. USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries, and a member of Eurodoc, the European Council for Doctoral Candidates and Junior Researchers.

The Union of Students in Ireland (USI) welcomes the opportunity to the National Plan for Equity of Access to Higher Education (2022-2026) and we have grouped our submission in the following areas:

1. Barriers to Accessing Higher and Further Education

2. USI's Vision for Equity of Access to Higher Education in Ireland
3. Target Groups for the National Plan for Equity of Access to Higher Education (2022-2026)
4. Pre-Entry activities
5. Mainstreaming Supports and Initiatives
6. Whole-of Education Approach to Widening Participation in Higher Education
7. Developing Pathways from Further Education to Higher Education
8. Social Inclusion Initiatives Outside of the Higher Education Sector Developed to Support Equity of Access Objectives
9. Challenges and Learnings from Covid-19

Introduction

USI has a history of supporting and fighting in the pursuit of equality across the island of Ireland. The basic principle on which the Union of Students in Ireland is built upon is to defend, promote and organise for the fundamental educational, welfare, economic, political, social, cultural and other interests of all the students in Ireland on a national and international level. USI welcomes the public consultation on the National Access Plan 2022-2026. Equity of access to higher education is a core component of the work of the Union of Students in Ireland (USI) and USI has worked alongside the Department of Further and Higher Education, Research, Innovation and Science, the Higher Education Authority and other stakeholders to develop access routes and supports for many students. The Union of Students in Ireland are also an active member on the National Access Plan Steering Group and look forward to continued development of access initiatives in the development of the National Access Plan 2022-2026.

While there have been several developments and initiatives developed to support access and participation over recent years, The National Access Plan is inhibited by inadequate funding supports such as SUSI which currently offers no funding to part-time or fully online students. USI believes there is a need to look at the holistic aims of the Department of Further and Higher Education, Research, Innovation and Science and how this can be best supported by a range of complimentary policies. One of the largest barriers to accessing third level education for a wide range of students is the student contribution

charge alongside increasing accommodation costs and additional hidden costs including unpaid placements and course related costs. Research undertaken by the USI found hidden costs are a major barrier for students, including student teachers where 45% of student teachers on placement and 43% of graduates contribute between €31- €60 on resources and materials per week.¹ The Study of Mature Student Participation in Higher Education found that financial cost was the biggest barrier for the participation of mature students within higher education, with 48% listing financial costs as a major barrier.²

As we look to the development of the next National Access Plan, we must look to address the largest barrier for participation in higher education, financial cost. As of February 2020, Ireland charges the highest flat cost for undergraduate study in the EU, currently standing at €3,000. First cycle students who qualify under the Free Fee Scheme still have to pay a student contribution charge of €3,000 per annum, with students who don't qualify for the Free Fee Scheme, international students and postgraduate students paying considerably more.³ The residency criteria for the free fees initiative prohibits many students, such as Irish citizens returning from a period abroad from availing of lower undergraduate fees and grant support. If a student is not eligible for the free fees initiative, they could be liable for paying anywhere between €2,000 - €6,000 in tuition fees, alongside the €3,000 student contribution charge.

USI believes that if we are to achieve the aims of the National Access Plan in widening access to Higher Education to all sections of society, we must aim to eradicate the financial barriers that limit access through the implementation of a full publicly funded system.

Recommendation:

- Introduce a publicly funded third level education system to alleviate one of the biggest barriers in accessing third level education in Ireland.

¹ Union of Students in Ireland, [Student Teacher Placement Report](#), 2017 p.5

² HEA, [Study of Mature Student Participation in Higher Education: What are the Challenges? Recommendations for the Future](#), 2021 p. vi

³ StudyInEurope.EU [Compare tuition fees schemes in Europe](#), accessed on June 16th 2021

Barriers to Accessing Higher and Further Education

Over the past number of years, a large emphasis has been placed on developing and supporting targeted access initiatives within further and higher education in Ireland. These initiatives have led to a considerable increase in participation from target groups, in particular students with disabilities. The number of students with disabilities has increased steadily across the lifetime of the current National Access Plan as has the number of students from specific disability categories. USI commends the fact that the current plan's target of 8% of new entrants being students with disabilities has been exceeded and currently stands at 12.3%.⁴ While we have made some developments in the participation rates of some target groups, we still have yet to meet the targets for mature student, Traveller student, Further Education qualifications holders and part-time student participation.⁵ Evidence from the HEA "Study of Mature Student Participation in Higher Education: What are the Challenges?" outlined that respondents who belonged to one or more National Access Plan target group reported much greater barriers than respondents who did not.⁶ A focus on intersectionality and on representing diverse voices within HEI management and academia is important in this regard alongside developing further flexible learning opportunities to support participation of many NAP target groups.

Recommendations:

- Provide greater provision of flexible learning opportunities.
- Institution-level support for NAP target students should continue.
- Focus access targets and supports on disadvantaged communities and the NAP target groups.

⁴ HEA, [Progress Review of the National Access Plan and Priorities to 2021](#), 2018 p. 17

⁵ HEA, [Progress Review of the National Access Plan and Priorities to 2021](#), 2018

⁶ HEA, [Study of Mature Student Participation in Higher Education: What are the Challenges? Recommendations for the Future](#), 2021 p. 78

- Review the targets within the previous NAP and determine the reasons for not meeting the set targets.

USIs Vision for Equity of Access to Higher Education in Ireland

Addressing the social and societal barriers to accessing higher education is vital, although it needs to be accompanied by steps to remove the financial barriers that students face such as tuition fees, course related fees, accommodation and the increasing cost of living. Over the past number of years, National Access Plan initiatives has left a lasting impact on the education landscape in Ireland and should be commended. While we have achieved a lot, we still have some way to go in realising the aims of the National Access Plan. While reviewing the plan, it is important to ensure that Government policies and departments are aligned in their objectives. Many Government policies are not always complimentary of one another. For example, the current National Access Plan is inhibited by inadequate policy within SUSI due to a lack of funding for part-time or online students. USI believes there is a need to look at the holistic aims of the Department and how this can be best supported by a range of complimentary policies.

In developing the next National Access Plan, we need to begin to view access as more than just entering college and look at the longer term, lifelong value sustained access to education would have for Irish society at large. Therefore, ensuring access supports are sustained and long lasting is important, including ensuring the sustainability of funding supports that are currently one-off. For example, the €300,000 provided to support Traveller progression and retention in higher education during the COVID-19 pandemic needs to be sustained in order to mitigate against the digital and connectivity divide experienced by many Traveller students.

In order to develop a higher education system that is accessible to all we need to address the barriers to postgraduate study. In March of this year, issues with students of receipt of the Disability Allowance accessing PhD/Postgrad Scholarships were brought to public attention. The Union of Students in Ireland and AHEAD Ireland came together to highlight this issue and were pleased to see changes being made by the Minister for Social

Protection.⁷ While this specific issue was resolved, there is work to be done in addressing the low participation rates of students from the NAP target groups within postgraduate research and study.

We in the Union of Students in Ireland applaud the different college-based access routes to support greater participation within higher education. However, these programmes and initiatives must form part of an aligned national strategy to increase participation in Higher Education amongst disadvantaged groups, underpinned by effective financial, and practical supports. While a number of reviews are underway including the SUSI review and HEAR review it is also of vital importance that other financial supports, such as Back to Education Allowance are reviewed in conjunction with the National Access Plan review in order to ensure that all financial supports are complimentary and work towards improving access to third-level education.

Target Groups for the National Plan for Equity of Access to Higher Education (2022-2026)

The development of targeted supports has seen positive developments in supporting access and participation from a number of marginalized groups within Irish society. The current National Access Plan saw increases in the number of students with disabilities, Traveller students, entrants from socio-economic groups that have low participation in higher education, first-time mature students, part-time/flexible learners and further education and training award holders. However, there remains considerable gaps with some groups continuing to be under-represented in higher education through the past number of National Access Plans. In particular, there continues to be low participation of students from unskilled socio-economic groups and Traveller students. Hence, continuing targeted supports for students with lower participation and progression rates is important.

⁷ AHEAD Ireland and the Union of Students in Ireland, [AHEAD/USI Submission on PhD/Postgrad Scholarships and Disability Allowance](#), 2021

In the previous National Action Plan, six target groups were identified with a focus on lone parents, teen parents and students from ethnic minorities also.

Building on learnings from the current National Access Plan and data outlining the significance of targeted supports USI makes the following recommendations:

- Continue to target the six current target groups; entrants from socio-economic groups that have low participation in higher education, first-time mature students, students with disabilities, part-time/flexible learners, further education and training award holders and Irish Travellers.
- Include Traveller and Roma students as a target group.
- Include migrant, asylum seekers and undocumented people as a target group.
- Include targets for mature student participation within the target groups to acknowledge the intersectional impact of access initiatives.

Traveller and Roma students

Our higher education classrooms and lecture halls must aim to be as representative of Irish society and possible and therefore increasing the number of Traveller and Roma students accessing, participating and progressing through higher education is important. While Traveller students were a target group within the current National Access Plan, we need to address the wider social, cultural and economic factors that significantly inhibit Traveller participation in Higher Education. When aiming to increase the number of Traveller and Roma students studying and researching within higher education, it is important to outline that the number of Traveller students that participate in higher education will be affected by the number of Traveller students that leave the post-primary school system before completion of the senior cycle and often these factors lie outside of the remit of the higher education system, outlining the need for increased access initiatives and interventions to react to these factors at an earlier phase of the education cycle.

In light of COVID-19, additional supports were provided for Traveller students through a €300,000 package to support the participation and retention of students from the Traveller

community progression in higher education during the COVID-19 pandemic⁸. USI welcomed the provision of this funding but believes that this must be sustained in order to have a long-lasting impact on the access and participation of Traveller and Roma students in Higher Education. While we have seen increases in the number of Travellers with a third level qualification (167 Irish Travellers held a third level qualification in 2016, up from 89 in 2011⁹), there is significant work still to be done in further improving participation of these communities. As a cohort, there are significant numbers of Travellers who were unemployed at the last Census, with an 80.2% unemployment rate among Irish Travellers in 2016¹⁰ further concurring the need to invest in educational supports and initiatives targeted at Traveller and Roma people.

Recommendations:

- Include Roma students within targeted supports for Traveller students.
- Increase access and outreach supports and links to primary and secondary level to support the transition to higher education for Traveller and Roma students.
- Develop training and awareness of social, cultural and economic factors that significantly impact Traveller and Roma participation within education for stakeholders across the education system.
- Increase and sustain financial supports aimed at addressing the digital and connectivity divide among Traveller and Roma students.
- Continue to work on the actions of the National Traveller and Roma Inclusion Strategy, 2017 – 2021¹¹ and Action Plan for Traveller Participation in Higher Education¹².
- Increase investment in supports for the transition from college into the workforce for Traveller and Roma students.
- Increase awareness of support services on campus and within the community for Traveller and Roma students.

⁸ Government of Ireland, [Press Release: Minister Harris announces roll-out of €300,000 in funding for Travellers in Higher Education](#), March 2021

⁹ Central Statistics Office, [Census of Population 2016](#)

¹⁰ Central Statistics Office, [Census of Population 2016](#)

¹¹ Government of Ireland, [National Traveller and Roma Inclusion Strategy, 2017 – 2021](#), 2017

¹² Department of Education and Skills, [Action Plan for Traveller Participation in Higher Education](#), 2019

- Higher Education Institutions should increase the resources allocated to access support services and student support services to ensure a whole college approach to inclusion of Traveller and Roma students.
- Identify cross departmental barriers to improving Traveller and Roma Participation, with a particular focus on greater communication and supports between the Department of Social Protection, the Department of Further and Higher Education, Research, Innovation and the Department of Children, Equality, Disability, Integration and Youth.
- Increase supports to reflect the rise in the cost of living and incorporate additional costs for Traveller and Roma students including rising childcare costs.

First Time Mature Students

Within the Progress Review of the National Access Plan and Priorities to 2021, the limited participation of first-time higher education of first-time mature students was evident. Where the baseline data for full-time mature student entrants in 2012/13 sat at 13% with a NAP target of 16%, the actual figure for 2019 sat at just 9%, a decrease of 4%. The figures for full and part-time/flexible mature entrants also saw a decline from 19% in 2012/13 to 16% in 2019, well below the original target of 24%.¹³

Over the past decade, we have seen a considerable decline in the numbers of first-time mature students in higher education. In 2010/2011 the rate of participation of mature students in higher education rose to a peak of 16% but since then the number decreased year on year since falling to 8% in the 2018/2019 academic year.¹⁴ The Study of Mature Student Participation in Higher Education demonstrates the high proportion of mature students studying part-time. The proportion of mature students in part-time study in 2019/20 was 87% against 12% in full-time education¹⁵ This important research conveys the important role which part-time study plays for mature students who often have additional responsibilities and commitments to balance alongside their studies. The

¹³ HEA, [National Access Plan and Priorities to 2021](#), 2019, p.18

¹⁴ Higher Education Authority, [Study of Mature Student Participation in Higher Education](#), 2021 p.14

¹⁵ Higher Education Authority, [Study of Mature Student Participation in Higher Education](#), 2021 p.22

limited financial supports available to part-time learners perhaps explains why this has not translated to greater representation of mature students in Higher Education overall, which will be outlined further later in the submission.

Research within the Study of Mature Student Participation in Higher Education outlined the significance of viewing access from an intersectional lens. In examining the trends in mature student participation, there is a higher concentration of mature students among members of the Traveller Community at 29%, compared to members of other NAP target groups including: students with a disability, Lone parent in receipt of a means tested social welfare payment and those from an area of economic and social disadvantage. While the Government's July 2020 stimulus package and the Human Capital Initiative (HCI) aims to increase capacity in higher education in skills-focused programmes designed to meet priority skills needs, we need to refocus efforts to address the lack of participation of first-time mature students within Higher Education Institutions.

Recommendations:

- Implement the recommendations of the Study of Mature Student Participation in Higher Education.¹⁶
- Begin the review process of the Back to Education Allowance as outlined within the Programme for Government with immediate effect.
- Increase financial supports to ensure more mature students can access postgraduate studies.
- Increased investment in supports for the transition from college into the workforce.
- Increase awareness of support services on campus and within the community for mature students.
- Higher Education Institutions should increase levels of resources allocated to mature support services to ensure a whole college approach to inclusion.
- Identify cross departmental barriers to accessing third level education, with a particular focus on greater communication and supports between the Department of Social Protection, the Department of Further and Higher Education, Research,

¹⁶ Higher Education Authority, [Study of Mature Student Participation in Higher Education](#), 2021 p.78

Innovation and the Department of Children, Equality, Disability, Integration and Youth.

- Increase supports to reflect the rise in the cost of living and incorporate additional costs for mature students including rising childcare costs.

Students with Disabilities

While we have made great strides to increasing the access and participation of students with disabilities, as a state we must ensure there is equity of access to Further and Higher Education to support those with a disability in reaching their educational goals. Article 24 of the UN CRPD¹⁷ outlines the important role the state plays in ensuring that persons with disabilities have an equal right to access tertiary education. Difficulties in accessing relevant supports can cause disengagement with education and result in people with disabilities being unable to continue within third level education.

Research undertaken by AHEAD found that 15,696 students with disabilities registered with disability support services for the academic year 2018/2019, representing 6.2% of the total student population in the institutions researched out of a total of 253,178 students.¹⁸ This stands in contrast to 4,853 in the 2008/2009 academic year meaning that, over the past ten years there has been a 200% increase in the number of students registered with disability support services in Ireland.¹⁹ However, when it comes to postgraduate study, only 2.4% of students are registered with disability support services, highlighting the significant access barriers present at this level.²⁰ While great progress has been made to support increased access and participation by students with disabilities within Higher Education, we still have some way to go in addressing the physical, financial, and societal barriers to accessing Higher Education. In March of this year, issues in accessing PhD/Postgrad Scholarships and the impact on accessing Disability

¹⁷ United Nations, [Convention on the Rights of Persons with Disabilities](#), Article 24 Education

¹⁸ AHEAD, [Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2018/19](#), 2020

¹⁹ AHEAD, [Numbers of Students with Disabilities Studying in Higher Education in Ireland 2014/15](#), 2016

²⁰ AHEAD, [Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2018/19](#), 2020

Allowance were brought to public attention. The Union of Students in Ireland and AHEAD came together to highlight this issue for many students with disabilities progressing to postgraduate studies.²¹

If we are committed as a state to ensuring people with disabilities are supported and empowered through our commitments and education under the United Nations Convention on the Rights of People with Disabilities (UN CRPD), we must proactively incorporate Universal Design for Learning principles into our education system.

For many students attending College is an exciting time, yet for students with disabilities they are met with further barriers to accessing third level. Within the National Housing Strategy for People with a Disability 2011 – 2016²², supporting students with disabilities is only briefly outlined. Students with disabilities encounter many additional costs when renting accommodation and may require additional reasonable accommodations or assistive technology/ ergonomic furniture and these additional costs can result in an inability to access third level education and gain independence.²³

Recommendations:

- Increase financial supports for disability related supports and initiatives within Higher and Further Education.
- Increase financial supports to ensure more students with disabilities can access postgraduate studies.
- Increase investment in supports for the transition from college into the workforce through supporting initiatives like the AHEAD Willing Able Mentoring (WAM) programme²⁴ and others.
- Increase awareness of support services on campus and within the community.

²¹ AHEAD Ireland and the Union of Students in Ireland, [AHEAD/USI Submission on PhD/Postgrad Scholarships and Disability Allowance](#), 2021

²² Government of Ireland, [National Housing Strategy for People with a Disability 2011-2016](#), 2011

²³ AHEAD and DAWN, [Inclusive Learning and the Provision of Reasonable Accommodations to Students with Disabilities in Higher Education in Ireland](#), 2019

²⁴ Willing Able Mentoring (WAM), AHEAD, Available at < <https://ahead.ie/wam>>

- Higher Education Institutions should increase levels of resources to disability support services to ensure a whole college approach to inclusion.
- Through cross sector collaboration, identify potential access barriers to third level for students with disabilities.
- Identify cross departmental barriers to accessing third level education, with a particular focus on greater communication and supports between the Department of Social Protection and the Department of Further and Higher Education, Research, Innovation and Science.
- Increase supports to reflect the rise in the cost of living and incorporate additional costs for students with disabilities.
- Address the lack of affordable and suitable accommodation provisions for students with disabilities within Purpose Built Student Accommodation (PBSAs) and other accommodation providers.
- Increase supports for students with disabilities when moving away from home for educational purposes as for many students with disabilities have additional accommodation related costs.
- Introduce financial supports to offset the costs related to alternative equipment or ergonomic furniture.

Part time and flexible learners

Those accessing third level education on a part time basis are met with numerous further barriers. One of the major barriers is lack of access to student grant supports for part time students and reduced access to financial supports while in college. Research conducted by AHEAD saw an increase of 21 % of the number of students with disabilities studying part-time in higher education in the 2018-2019 academic year.²⁵ The increase in students wanting to study part-time highlights the need to address these barriers immediately. The 2012 HEA report, “Part-time and flexible HE in Ireland – Policy, Practice and

²⁵ AHEAD, [Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2018/19 Report](#), 2020

Recommendations for the Future”²⁶, outlined the need to make part-time/ flexible HE more accessible, including to a more diverse range of students and recommended full equality of provision and support in HE for all learners, regardless of mode or duration of study by 2016.

As we prepare for the next National Access Plan and gain learnings from the move to online and hybrid delivery, many students wish to see an increase in part-time and flexible study options. Only students on full-time programmes are eligible for the Free Fees Scheme, SUSI and the Back to Education Allowance (BTEA), irrespective of the number of ECTS being taken and this is a major barrier to undertaking part-time and flexible means of study.²⁷ For mature students, aspects of the current model of education delivery represent barriers to participation with 20% of mature students outlining they would value increased availability of part-time courses, the options for online or distance learning, and flexibility in time to complete modules.²⁸

Recommendations:

- Ensure that grant supports currently available to full-time students are extended and offered to part-time students who qualify under the other criteria.
- Finance student services and student experience to enhance the supports and experience for part-time and flexible students.
- Increase availability of part-time courses, the options for online or distance learning, and flexibility in time to complete modules.

Migrant and asylum-seeking students and undocumented persons

USI would recommend that Migrant and asylum-seeking students and undocumented persons are included as a target group within the next National Access Plan. At the start of 2014, there were 4,360 people in direct provision compared to April 2020 where there

²⁶ Higher Education Authority, [Part-time and flexible HE in Ireland – Policy, Practice and Recommendations for the Future](#), 2012

²⁷ IUA, [A Student is a Student is a Student”: a Position Paper on Part-Time/ Flexible Study in Irish Higher Education](#), 2020

²⁸ Higher Education Authority, [Study of Mature Student Participation in Higher Education](#), 2021 p.77

were approximately 7,400 adults and children living in the 38 direct provision centers.²⁹ The average length of stay in Direct Provision is 24 months, with some residents having spent up to 10 or 12 years living in these conditions. 15.8% of people are spending between 2 to 3 years, 13.8% between 3 and 4 years and 4.7% of people between 4 and 5 years. 2.5% of people have been in the system for more than 7 years.³⁰

There are limited supports available for this cohort of students through the Student Support Scheme. In the 2019/2020 academic year, there were 109 applications to the Student Support Scheme of which 40 students were awarded support showing the small number of students who are supported by this scheme. International protection applicants must be in the system for 3 years before they can avail of the current student support scheme to enter third level. Those excluded from the grant scheme are still required to pay international tuition fees which can cost up to €20,000 a year. While many campuses have started implementing Sanctuary scholarships for those in direct provision, the number of places are severely limited and do not go far enough to address issues around paying for accommodation, course related costs and the increasing costs of living.

As a group, asylum seekers are five times more likely to develop mental health difficulty³¹ and up to 15 times more likely to be diagnosed with depression, anxiety or post-traumatic stress disorder.³² The White Paper on Ending Direct Provision acknowledges the difficulties encountered by young people living in Direct Provision in accessing higher education and review of the National Access Plan offers us the opportunity to meaningfully support these students.³³ The Department must also work with the Department of Justice to ensure students attending further and higher education do not receive deportation orders during their studies. Supports must be prioritised for students studying in Ireland and for them to gain employment once they graduate.

²⁹ Office of the Ombudsman, [The Ombudsman & Direct Provision: Update for 2019](#), 2020

³⁰ Department of Justice and Equality, [Reception and Integration Agency Monthly Report](#) November 2018.

³¹ Doras, [Mental Health and Direct Provision: Recommendations for Addressing Urgent Concerns](#), 2020

³² Bogic, M., Njoku, A. & Priebe, S. [Long-term mental health of war-refugees: a systematic literature review](#). *BMC International Health and Human Rights*, 2015, 15, 1–41

³³ Department of Children, Equality, Disability, Integration and Youth, [White Paper on Ending Direct Provision](#), 2021, p.121

Recommendations

- Allow migrants, asylum seekers, those who are undocumented and those within the Direct Provision system to qualify for free fees initiative and be eligible for EU fee rates.
- Include migrants, asylum seekers and those who are undocumented as a target group within the next National Access Plan.
- Provide financial supports to address accommodation costs for migrants, asylum seekers and those who are undocumented.
- Prevent students attending third-level education from being issued deportation orders throughout the course of their studies.

Pre-Entry activities

Through the development and implementation of the previous National Access Plans we are aware of the important role that access and pre-entry supports play in supporting students from the National Access Plan target groups. During the National Access Plan Student event, students in attendance highlighted a number of key areas of focus:

- Access to diagnosis and supports while coming to the end of their second level education.

A focus on the provision of diagnosis and support while at primary and secondary level is important to empower students to disclose the supports needed at third level.

- Focus on supports available at third level while at junior cycle.

Students present at the NAP student event outlined the need for system alignment while at second level which would allow students to continue their access to supports from second level to third level and not providing supports solely while in senior cycle. For many students, particularly students with disabilities, continued access to supports and equipment is important in the transition to third level, with many currently left waiting for support or equipment provision in the first few months at third level.

- Greater career guidance linkage between second and third level

Many students highlighted the lack of cohesion between support and guidance services at second and third level as a huge barrier and resulted in many being unaware of the supports available to them at third level, prior to commencing their studies. Students at the NAP Student event highlighted the need for greater linkage between supports in second level e.g., career guidance to third level supports including access and student services. Greater alignment and communication between these services would support students in transitioning to third level.

- Empowering students to disclose their disability.

The important role of guidance within second level was outlined through the student event. Students with disabilities present outlined the need to train career guidance counsellors in supporting students to disclose their disability and empower them to advocate for their needs while in third level and employment.

Recommendations

- Increase provision of diagnosis and support while at primary and secondary level.
- Increase linkage of supports and career guidance from second level into third level.
- Disclosure training for career guidance teachers.
- Equipment provided should be person-centered and not owned by the College/Institution/School.

Mainstreaming Supports and Initiatives

At the National Access Plan Student event, there were clear calls to mainstream and align supports and initiatives. Align reforms of the National Access Plan to wider system reforms e.g., SUSI reform, HEAR reform, Leaving Certificate reform, Cassell's report etc. Students at the NAP Student event highlighted the important role access and student support services provide within institutions yet outlined that access and support cannot be confined solely to these services. Management and all staff within institutions need to take responsibility for the implementation and success of the National Access Plan to ensure there is a whole of institution approach to increasing access and participation. The

students in attendance highlighted the need to link any developments of the National Access Plan to the United Nations Convention on the Rights of Persons with Disabilities.

A focus of discussion at the NAP Student event surrounded the need to focus on the useability of services and include the requirements and/or needs for service users. This can be achieved through auditing supports and initiatives to assess their impact and whether they are addressing needs and reaching as many people as possible. Through this focus on useability of services, facilities and the environment, a continued focus on implementing the principles of Universal Design and Universal Design for Learning within third level is vital. Many also voiced the need to ensure a national approach is taken to access services and supports, ensuring equal supports are available to students in all HEIs nationally, regardless of institution size or type.

Whole-of Education Approach to Widening Participation in Higher Education: Developing Pathways from Further Education to Higher Education

The creation of the Department of Further and Higher Education, Research, Innovation and Science was an important step in ensuring further education is given the same support and attention as higher education. Within the Further Education sector, students also face a number of barriers to accessing education with lack of parity of esteem with their Higher Education peers being one of the major barriers they face for example, access to SUSI for students undertaking degrees in other types of institution such as FET colleges is difficult with students undertaking qualifications above Level 7 in FET colleges being unable to access the same level of support as their HE peers. USI would welcome greater collaboration across the FET and HE sector in order to develop clearer transition routes between both sectors.

Ensuring the student and learner voice within the FET sector is heard and valued is important and we in USI would welcome the opportunity to support in this work, as is

further outlined within our Further Education & Training Strategy 2021-2024.³⁴ The appetite for further enhancement of student representation structures within the FET sector have been widely acknowledged by many stakeholders including SOLAS, FET Colleges Ireland and the Department of Further and Higher Education, Research Innovation and Science. The 'SOLAS Future FET Strategy 2020-2024' acknowledges the need, stating that “more effective means of representation should be developed, ensuring a clear learner voice on organisation oversight, planning provision, delivering support services, curriculum development, quality assurance and improvement, and future strategy”.³⁵

During the National Access Plan Student Event, many students attending the event called for access to diagnosis and supports while coming to the end of their second level education, better support in the transition to further and higher education and greater linkage between the second and third level system. For many students coming from further education to higher education, they may be unsure of supports available and therefore greater focus on highlighting supports and initiatives available while in further education is important. This could be achieved through greater linkage and communication between second level, FET and HE support services.

Ensuring this work is led by the experts in the area is important e.g., giving the National Forum for the Enhancement of Teaching & Learning the space to lead on the development of Higher Education sector priorities/strategies around Teaching & Learning in collaboration with students, sector bodies etc.

USI fears that lack of consolidated and joint up thinking and whole of system approach to policy development and decision-making leads to duplication of effort, or in some cases, areas being missed entirely. Student input into policy development is not always facilitated until formal consultation is undertaken. If as a sector we aim to meet the Minister's ambitions of being 'the Department for Students', then this culture needs to change. The process for policy development must include voices from all key

³⁴ Union of Students in Ireland, [Further Education & Training Strategy 2021-2024](#), 2021

³⁵ SOLAS FET Strategy 2020-2024, Available at <
https://www.solas.ie/f/70398/x/64d0718c9e/solas_fet_strategy_web.pdf>

stakeholders, including student and staff representatives, in the development of this new action plan. USI, student representatives and students were consulted through meaningful processes, and we would welcome this continuing as the plan develops and is implemented.

Recommendations

- Improve access to diagnosis and supports for students coming to the end of their second level or further education.
- Greater linkage and highlighting of supports and initiatives available while in further education.
- Greater linkage across Government Departments including Department of Further and Higher Education, Research, Innovation and Science, Department of Education, Department of Social Protection, Department of Children, Equality, Disability, Integration and Youth and the Department of Justice.
- Ensure student voice and lived experience is embedded within all policy development and decision-making regarding access.
- Work towards a whole of institution and whole of sector approach to access and support.

Social Inclusion Initiatives Outside of the Higher Education Sector Developed to Support Equity of Access Objectives

Students attending higher education want to gain qualifications that will support them in entering the workforce. However, many of the NAP target groups are overlooked and under-served in the Irish labour market including women, lone parents, young people, migrants, ethnic minorities including Travellers and persons with disabilities. People from these groups are more likely to face restrictions in accessing the labour market, face barriers in occupational attainment, are more likely to have lower pay, lower security and

stability in work, and are more exposed to work-related discrimination.³⁶ Research from the CSO outlined that those with a third level degree or above are only 7.0% at risk of poverty compared to 20.4% for people when their highest education attainment was lower secondary.³⁷

According to research undertaken by the European Disability Forum, people with disabilities are twice as likely to live in poverty than those without a disability³⁸ and nationally in Ireland we see this statistic replicated here.³⁹ They are also less than half as likely to be in employment as their peers without a disability.⁴⁰

People with disabilities are more likely than the general population to be poor and to depend on social welfare payments for their income with one of the biggest reasons for this being the difficulty they have in gaining or retaining employment.⁴¹ Research undertaken by AHEAD found that only 37% of respondents had targeted recruitment aimed at people with disabilities.⁴²

The most recent Survey on Income and Living Conditions (SILC) data outlines the stark differences in poverty rate between those with a disability and those without:

- The consistent poverty rate for people not at work due to illness or disability is 18.1%. This rate for the general population is just 5.5%, meaning people who rely on state disability payments are more than 3 times as likely to live in consistent poverty as the average person.⁴³
- The 'at risk of poverty' rate for this group is 37.5 percent. By contrast, the 'at risk of poverty' rate for the general population is 12.8 percent, 3 times lower than that for people with disabilities.⁴⁴

³⁶ Irish Human Rights and Equality Network, [Monitoring Decent Work in Ireland](#), 2021 p.4

³⁷ Central Statistics Office, [Survey on Income and Living Conditions \(SILC\) 2019](#), 2019

³⁸ European Disability Forum, [Human Rights Report](#), 2020

³⁹ Economics and Social Research Institute, [Poverty Dynamics of Social Risk Groups in the EU](#), 2018

⁴⁰ Economics and Social Research Institute, [Employment Transitions Among People with Disabilities in Ireland an Analysis of the Quarterly National Household Survey](#), 2017

⁴¹ Economics and Social Research Institute, [Employment Transitions Among People with Disabilities in Ireland an Analysis of the Quarterly National Household Survey](#), 2017

⁴² AHEAD, [Employer Attitudes to Hiring Graduates with Disabilities Survey 2021](#), 2021

⁴³ Central Statistics Office, [Survey on Income and Living Conditions \(SILC\)](#), 2019

⁴⁴ Central Statistics Office, [Survey on Income and Living Conditions \(SILC\)](#), 2019

For many students from the National Access Plan target groups, entry or return to the work force is their overall aim yet for many reasons including financial barriers and loss of social welfare supports would inhibit people from returning to the workforce.

Recommendations:

- Continue to address the barriers to entering the work force for people within the NAP target groups.
- Provide training and supports to employers to encourage greater inclusion of people with disabilities, mature persons and ethnic minority people within the workforce.
- Introduce a cost of disability allowance to address the poverty and social exclusion of people with a disability.⁴⁵
- Introduce a living wage to ensure all workers meet the average minimum essential costs.⁴⁶

Challenges and Learnings from Covid-19

Covid-19 highlighted the importance of access routes as a way of supporting entry to Higher Education for socially disadvantaged groups. Access policy must also aim to support these same students throughout their studies and as they transition out of Higher Education into employment and further study. We cannot forget the learnings from Covid-19 regarding the value of enhanced flexibility in the provision of teaching, learning and assessment for the student population as a whole, and for students from NAP target groups in particular. The pandemic-imposed restrictions changed the higher education landscape dramatically overnight with many of the frequently requested initiatives such as lecture recording and uncapped resits being implemented rapidly after years of calls for same by student representatives and students from target group. Momentum for the creation of a Higher Education system based on the principles of Universal Design for Learning has increased significantly across the pandemic and it is important that we

⁴⁵ Social Justice Ireland, [Social Justice Matters 2021 guide to a Fairer Irish Society](#), 2021, page 80.

⁴⁶ Social Justice Ireland, [Budget Choices](#), 2020

continue to pursue this vision in order to improve the overall accessibility of third-level education.

Concluding Statements

The Union of Students in Ireland welcomes the opportunity to participate Public Consultation National Plan for Equity of Access to Higher Education (2022-2026). USI welcomes the progress made to date in relation to policy development and access initiatives in the previous National Access Plans. USI is committed to working closely with the Department of Further & Higher Education, Research, Innovation and Science, Higher Education Authority and all sectoral stakeholders to ensure the development of the next National Access Plan that places the needs of students at its' core.

In providing this written submission to the HEA, USI would be happy to be involved in further conversations relating to the development of the National Plan for Equity of Access to Higher Education (2022-2026) and would welcome the opportunity to meet with Department and HEA officials to discuss the contents of this submission further.

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References

AHEAD and DAWN, [Inclusive Learning and the Provision of Reasonable Accommodations to Students with Disabilities in Higher Education in Ireland](#), 2019

AHEAD Ireland and the Union of Students in Ireland, [AHEAD/USI Submission on PhD/Postgrad Scholarships and Disability Allowance](#), 2021

AHEAD, [Employer Attitudes to Hiring Graduates with Disabilities Survey 2021](#), 2021

AHEAD, [Numbers of Students with Disabilities Studying in Higher Education in Ireland 2014/15](#), 2016

AHEAD, [Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2018/19](#), 2020

Bogic, M., Njoku, A. & Priebe, S. [Long-term mental health of war-refugees: a systematic literature review. BMC International Health and Human Rights](#), 2015,15

Central Statistics Office, [Census of Population 2016](#)

Central Statistics Office, [Survey on Income and Living Conditions \(SILC\)](#), 2019

Department of Children, Equality, Disability, Integration and Youth, [White Paper on Ending Direct Provision](#), 2021

Department of Education and Skills, [Action Plan for Traveller Participation in Higher Education](#), 2019

Department of Justice and Equality, [Reception and Integration Agency Monthly Report November 2018](#).

Doras, [Mental Health and Direct Provision: Recommendations for Addressing Urgent Concerns](#), 2020

Economics and Social Research Institute, [Employment Transitions Among People with Disabilities in Ireland an Analysis of the Quarterly National Household Survey](#), 2017

Economics and Social Research Institute, [Poverty Dynamics of Social Risk Groups in the EU](#), 2018

European Disability Forum, [Human Rights Report](#), 2020

Government of Ireland, [National Housing Strategy for People with a Disability 2011-2016](#), 2011

Government of Ireland, [National Traveller and Roma Inclusion Strategy, 2017 – 2021](#), 2017

Government of Ireland, [Press Release: Minister Harris announces roll-out of €300,000 in funding for Travellers in Higher Education](#), March 2021

HEA, [Progress Review of the National Access Plan and Priorities to 2021](#), 2018

HEA, [Study of Mature Student Participation in Higher Education: What are the Challenges? Recommendations for the Future](#), 2021

Higher Education Authority, [Part-time and flexible HE in Ireland – Policy, Practice and Recommendations for the Future](#), 2012

Higher Education Authority, [Study of Mature Student Participation in Higher Education](#), 2021

Irish Human Rights and Equality Network, [Monitoring Decent Work in Ireland](#), 2021 p.4

Irish Universities Association, [A Student is a Student is a Student”: a Position Paper on Part-Time/ Flexible Study in Irish Higher Education](#), 2020

Office of the Ombudsman, [The Ombudsman & Direct Provision: Update for 2019](#), 2020

Social Justice Ireland, [Budget Choices](#), 2020

Social Justice Ireland, [Social Justice Matters 2021 guide to a Fairer Irish Society](#), 2021,

SOLAS FET Strategy 2020-2024, Available at <
https://www.solas.ie/f/70398/x/64d0718c9e/solas_fet_strategy_web.pdf>

StudyInEurope.EU [Compare tuition fees schemes in Europe](#), accessed on June 16th 2021

United Nations, [Convention on the Rights of Persons with Disabilities](#), Article 24
Education

Union of Students in Ireland, [Student Teacher Placement Report](#), 2017