

Submission 3.6 NCGE

NCGE is an agency of the Department of Education (DE) with responsibility to inform the policy of the DE and the Department of Further and Higher Education, Research Innovation and Science, (DFHERIS) on guidance in education and training sector and to support the development of quality guidance practice in post-primary and FET. NCGE represents the Department and Ireland at EU Commission level on the development of EU policy on lifelong guidance and was directly involved in the development of the guidelines and publications of the European Lifelong Guidance Policy Network (ELGPN).

The NCGE Management of Guidance Committee is a sub-committee of the Board of Léargas with committee members nominated by the Minister, and appointed by Léargas, to include relevant stakeholders such as the Department, DSP, Léargas, HEA, SOLAS, ETBI, IGC, Adult Guidance Association, University Directors of Studies of Guidance Counselling, NAPD. Paul King (DCU) is the Ministers' nominated Chair.

The following submission provides a general response by NCGE to the questions posed by the partnership of the Higher Education Authority (HEA) and DFHERIS in the development of the next National Access Plan for the period 2022 – 2026, and will attempt to address some of the questions posed in the National Access Plan 2022 – 2026 Consultation Paper.

NCGE welcomes that various national strategies are based on the current elements of the Programme for Government 2020, in areas such as Reskilling and Retraining: developing a culture of lifelong learning; developing a standardised system of accreditation of prior learning; support the recovery phase with the provision of new career paths for people with different interests and abilities; improving access to Higher Education for Traveller community; improving access to FET and HE generally; supporting pathways to professions for disadvantaged students; taking account of the 17 UN Sustainable Development Goals and focusing on social inclusion, anti-poverty and Community development.

NCGE welcomes the Programme for Government focus to examine the creation of a single-information portal for school-leavers for both Further Education and Higher Education programmes of study and to ensure that Ireland supports our citizens and general population to recognise our place as global citizens at the heart of Europe.

NCGE expects that it is incumbent on DFHERIS and HEA to report on the UN Convention on the Rights of Persons with Disabilities following its ratification in Ireland 2018. People with Disabilities are included within the target groups of both the AEGS and the HEA National Access Plan (NAP). Provision of information and educational and career guidance to support access to both FET and HE opportunities should be included in such reports based on the Council of Europe Action Plan to promote the rights and full participation of people with disabilities in society, improving the quality of life of people with disabilities in Europe 2006-2015: which included reference to access to employment, vocational guidance and training. Provision of nationally available guidance services providing impartial information and guidance to those adults with disabilities who wish to engage or re-engage with education will allow DE, DFHERIS, HEA and SOLAS account for this activity in such reports.

Higher Education in Ireland should be accessible to all who wish to enter into HE, whether directly from post primary school or as an adult (i.e. all those over the age of 18 years) returning

to education, as undergraduate or returning to HE to complete post-graduate level. Impartial accessible information and guidance should be available to all across the lifespan to support them to consider their options for attending HE.

NCGE proposes that the provision of quality impartial guidance with up-to-date information on all education and training options in FET and HE is vital to encourage and support access to Higher Education for all target groups.

Within this document, NCGE will refer to the term “Guidance” as the overarching concept for the provision of careers guidance, careers education/development and guidance counselling.

Guidance

The EU Council Resolution, 2008, on better integrating lifelong guidance into lifelong learning strategies states :

“...the definition of Guidance as referring to a continuous process that enables citizens at any age and at any point in their lives to identify their capacities, competences and interests, to make educational, training and occupational decisions and to manage their

individual life paths in learning, work and other settings in which those capacities and competences are learned and/or used. Guidance covers a range of individual and collective activities relating to information-giving, counselling, competence assessment, support, and the teaching of decision-making and career management skills.”

In 2007, the Irish National Guidance Forum, stakeholders from across education, training and the labour market agreed on a national definition “Guidance facilitates people throughout their lives to manage their own educational, training, occupational, personal, social, and life choices so that they reach their full potential and contribute to the development of a better society” .

Building on the vision set out in the previous HEA (2015, p.7) report “to ensure that the student body entering, participating in and completing higher education at all levels reflects the diversity and social mix of Ireland’s population”, the NCGE identifies the means to address the shortcomings of the National Access Plan 2022 – 2026 Consultation Paper through the lens of guidance in education across the lifespan. The updated vision for equity of access to higher education in Ireland for 2022-2026 should ensure that all individuals have access to an impartial, free, high-profile year-round public adult guidance service that is available both online and face-to-face, delivered by competent professionals at every transition point as they navigate their way through life. The NCGE believe that this service should be available to all individuals irrespective of their socio-economic background, ethnicity, gender, geographical location, disability or other circumstances.

Guidance services should be delivered by those with the requisite qualifications and skills to foster trust and confidence among the most vulnerable members of our community. In addition, there should be a joined-up approach between the different services and agencies currently available to ensure seamless delivery, avoiding duplication contributing to a sustainable, transparent, accountable, and evidence-based service delivery model.

The current practice of funding for guidance services is based on the model of DE funding guidance in schools, SOLAS funding guidance in FET, with HEA funding access programmes and careers services through the student support programme. These guidance services do not

formally connect, co-ordinate or make cross referrals. The development of the National Guidance Strategy would address the co-ordination and delivery of considered and cohesive guidance services to support access to FET and HE programmes, as often it is through progression from FET that learners will access HE.

The ETB Adult Education Guidance Services (AEGS) were originally established to support adults to return to basic education and FET programmes. NCGE Statistical Reports show that , over the course of 14 years, that 19.9% were referred to HE programmes.

It is the role of quality guidance services to provide impartial information and guidance to potential learners. Reports from the Adult Guidance Management System (AGMS) (i.e. the database of the AEGS) indicate that , from 2004-2018, with 643,225 individual beneficiaries accessing impartial information and guidance in the AEGS nationally , 19.9% of clients planned to or progressed into HE. AEGS work closely with the DSP in relation to client eligibility and financial supports available.

In recognition that “teachers have a critical role to play in raising academic aspirations” (HEA 2015, p.17), the NCGE echo a call by the OECD (Musset and Kureková Mýtina 2018) that career guidance should be included within Initial Teacher Education and ongoing Professional Development amongst school staff to embed careers education in the curriculum and nurture an awareness of post-secondary school pathways from an early age. These points were also emphasised in a recent webinar (OECD 2021) delivered by policy analysts of the OECD and are supported by evidence-based research (Covacevich et al.

2021). According to Covacevich et al. (2021, p. 59), “effective counsellors will encourage and enable students to engage in multiple and continuing discussions about their career interests and how they relate to their educational experiences”.

Irish studies have demonstrated the benefits of the vocational/career and personal/social dimensions of post-primary school guidance to support progression to third level education (McCoy et al. 2006; Smyth and Hannan 2007; Smyth and Banks 2012; McCoy et al. 2014; Indecon 2019). Clear benefits were evident among schools in receipt of an additional allocation of guidance counselling hours through the Guidance Enhancement Initiative, which reportedly had “more targeted and focused guidance interventions”, including more guidance for junior cycle students and personal support for students (DES 2006, p.135). A study that analysed applications and entry to higher education in Ireland reported higher rates of college application in those schools with a greater number of hours for career guidance when compared with other schools (Smyth and Hannan 2007). In another study, qualitative interviews of 27 young people (aged 21-23) highlighted the importance of guidance interventions in the decision-making process upon leaving second level education (McCoy et al. 2014). Furthermore, young people from working-class backgrounds were more dependent upon school-based guidance than their middle-class peers (McCoy et al.

2014). Similarly, guidance counsellors were found to be one of the most effective means of provision of career information in a recent report (Indecon 2019).

Currently the allocation of guidance hours in schools remains lower than the pre-2012 ex- quota guidance position based on student enrolment . A minimum ratio of 22 hours for guidance for 500 students should be considered as the autonomy afforded to management since 2012 has

meant that when resources are tight, hours for guidance have been diverted to other school causes, giving rise to inequitable provision (McCoy et al. 2014; Smyth et al. 2015). Smyth et al. 2015, in reports published by the ESRI, have proposed that reinstating the ex-quota model of guidance will help address the inequitable provision of guidance nationally.

In addition, the NCGE welcomes support for initiatives such as the work of the Trinity Access Programme (College for Every Student <https://brilliantpathways.org/>) (or the Canadian Career Trek (2021) approach) as models of practice that could be rolled out nationally for all students who are underrepresented at third level.

The NCGE commends the progress made by the Higher Education Access Route (HEAR) and Disability Access Route to Education (DARE) college and university admissions schemes for prospective students who are underrepresented at higher education due to their socio-economic background or whose disabilities have had a negative impact on their second level

education (Access College 2021). This progress would not be possible, however, without the work of the school based guidance counsellor, and NCGE would welcome this recognition. These critical pre-entry schemes should be expanded to Further Education colleges as identified in the National Plan for Equity of Access to Higher Education 2015-2019 (HEA 2015). The Covid pandemic will have placed additional pressures on families, and a review of the income threshold to assess the eligibility of the HEAR scheme and SUSI grant is warranted on this basis. There should be a national database of supports available at third level so that students eligible for HEAR and DARE schemes can make informed decisions about what colleges are best equipped to support their post-entry needs.

Target Groups

It is critical to recognise that pathways to HE will require lifelong learning approach where some individuals will benefit from a return to education through the FET sector first, prior to progression to HE. The list of designated “target groups” of the ETB Adult Education Guidance Services was outlined by the Department of Education and Skills in 2012 to ensure provision of impartial accessible guidance to the most vulnerable and marginalized groups, such as all Adults and young people aged over 16 years who left school with low or no formal qualifications or low literacy levels.

This list of “target groups” should be considered in addition to specific focus on students from disadvantaged backgrounds, those attending DEIS schools and ethnic minority groups, and in particular those for whom English is their second language. Clarification of “vulnerable” can prove difficult as there are disadvantaged children with disabilities attending non DEIS schools, and children from “educationally advantaged” backgrounds attending DEIS schools. It is crucial here to consider the circumstances of the individual and not the institution to which they are attached.

Pathways and Transitions

Processes for application to HE need to be clear, unambiguous and transparent. Where there are clear procedures for applications directly from the school system, the development of pathways from FET to HE should be nationally agreed systems, making use of QQI structures. Locally developed progression options between FET centres and HE institutions do not benefit all FET students nationally. HE should consider that applications from FET learners should

include an increased quota of places to ensure progression opportunities , in particular for those “ disadvantaged” adult learners who have returned to education through the FET system and are more prepared for progression options into HE programmes at NFQ Levels 7 and 8 .

Access programmes / work shadowing opportunities to support young people and adults to experience HE learning , as part-time or fulltime or online students is necessary. Continued development of partnership with schools and FET sector at local and regional level is required to ensure cohesive and approach to supporting access to HE.

Financial supports available for younger student and adults and clarity of the costs of attending HE are required to support pre-entry decisions. Exploration with employers

regionally on partnership approach to learning while working, outside of the apprenticeship model is crucial to support those who are required for personal reasons to continue to earn a salary and yet wish to complete Higher Education programmes not available through the Apprenticeship programmes.

Standardisation and clarifications of national Recognition of Prior Learning (RPL) processes will support more appropriate pathway progressions for all concerned.

Clarification of Pre-entry is required. Pre-entry for a student completing the Leaving Cert in school is different to pre-entry for a young adult, aged 24 years, with refugee status , family financial difficulties and childcare issues. Post-entry requires onsite supports, financial and academic, mentorship programmes and ongoing guidance support to ensure development of career management / career development skills, to confirm life and / or education and career goals and outcomes .

Funding and Social Protection

Recognition of the role of the Dept of Social Protection is crucial for those who wish to access HE from less traditional or disadvantaged groups . Access to SUSI grant for unemployed individuals in conjunction with social protection issues such as housing supports, access to free or affordable childcare, medical card etc is vital to removing barriers to progression into and completion of HE . Funding mechanisms require a whole of government focus to support adults returning to education .

To minimize some of the physical and practical barriers to access, with financial constraints, consideration must be given to establishment of online provision and outreach campus developments across the geographically hard to reach areas .

Implications from Covid pandemic

Initial , anecdotal evidence to NCGE suggests that some students in HE responded more favorably to online learning than others. Those with mobility or health issues could participate in HE in more suitable ways than prior to the school / college closures due to the pandemic. However the reported access to (or lack of) broadband, a suitable place to study and/or research, and difficult family circumstances and housing accommodation have provided challenges.

It is important to consider that the provision of HE programmes online allowed students who were struggling financially or personally to “ go to college” but not “ leave home” which suggests opportunities for developing a blended learning approach to future teaching and learning approaches in HE.

Despite the move at national policy level to support more home / remote based working opportunities, the long term implications of education in such isolation may not be conducive to the development of relevant and necessary career related skills such as team work. These issues will need to be considered further in light of further national policies on remote working.

Where the target remains to reach more adult learners to encourage them to engage in HE programmes, the development and use of a blended approach with online teaching and learning and face to face delivery, as a result of the pandemic, cannot be underestimated.

Social Inclusion

HEA National Access Plan Interim report detailed requirement for social inclusion, and access to HE for disadvantaged groups. Key to this access is nationally accessible guidance services for ALL, delivered online and through walk – in service across ETBs and ensuring career development skills are integrated into schools’ curriculum and all relevant FET programmes. Furthermore, the Social Inclusion and Community Activation Programme (SICAP) developed by POBAL and Dept of Rural and Community Development, provides “supports for disadvantaged individuals to improve the quality of their lives through the provision of lifelong learning and labour market supports”. In the event that individuals “targeted “ by this SICAP programme are considered “ target groups” for the National Access Plan, it is crucial that such groups are provided with access to the professional guidance and information staff and programmes of the ETB AEGS.

Education for Sustainable Development

The National Access Plan will be required to take account of national policies for the implementation of the UN 17 Sustainable Development goals. In this context, NCGE has held 2 National Guidance Forum meetings focusing on the role of guidance in supporting the implementation of these SDGs. Further information is available from NCGE, but in summary Guidance has a role in supporting the implementation of Goals 4, 5 and 8.

Each of these has a direct implication for the HE National Access Plan :

GOAL 4: Insure inclusive & equitable quality education & promote lifelong learning opportunities for all Goal 4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship

Goal 4.5 By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations

Goal 5.1 End all forms of discrimination against all women and girls everywhere

Goal 5.5 Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life

Goal 8.3 Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation....

Goal 8.5 By 2030, achieve full and productive employment and decent work for all women and men

Goal 8.6 By 2020, substantially reduce the proportion of youth not in employment, education or training

Graphic Illustration

The following provides a graphic illustration of how guidance provision to an individual is embedded in the context of that individual: - supporting the person to consider their own personal circumstance, their experiences, interests and aptitudes and to develop the skills of career development in career decision making , applications processes etc and to consider these plans in the context of the wider economic conditions and requirements of society.

In summary

DHERIS and HEA have a clear opportunity now , under the auspices of the new National Action Plan and the FET Strategy 2020-2024 , to reconsider , reconfigure and resource the role and remit of the ETB AEGS to ensure provision of impartial accessible information and guidance to ALL individuals within the necessary target groups for FET and HE. Based within the ETBs regionally, with a national requirement to connect with the Regional Skills agenda, the ETB AEGS services are perfectly placed to provide information and guidance, and to liaise directly with DSP on all adults who wish to consider their HE options, whether as progression from FET or access into HE directly.

The National Access Plan is directly reliant on the development of a DE / DFHERIS agreed National Guidance Strategy, which will provide an opportunity to develop the “integrated strategic approach to tertiary education” as per the previous DES Action Plans.

NCGEs welcome the opportunity to discuss any of the above points within a bilateral meeting and / or stakeholder consultation group with those responsible for this invaluable work.

Submission 3.7 QQI

QQI welcomes this opportunity to contribute to the consultation on the development of the fourth National Access Plan, providing for equity of access measures to higher education.

The successful growth in increased participation across the Framework, including by communities, families and individuals who would not previously or typically have enjoyed opportunities associated with higher education without the work of successive National Access Plans, communities of practice, policy and the breadth of stakeholders is acknowledged at the outset.

QQI is finalising a fourth Statement of Strategy which outlines how we will contribute to shaping Ireland as an island of innovation, talent, international leadership, inclusion and engagement,

fully aligned to the ambitions of the Department of Further and Higher Education, Research, Innovation and Science. QQI will collaborate to meet the challenges faced nationally over the period of the next Access Plan, including through supporting the development of an integrated approach to the diversity of quality and qualifications across a dynamic tertiary education and training system - including further and higher, education and training, public and private stakeholders.

Towards a nationally coherent approach to access, transfer and progression

Specific recent actions¹ by QQI in stewarding the qualifications system have laid the groundwork for a modern, integrated system that will accommodate digital qualifications, micro-credentials and the recognition of both previously credentialed and non-formal and informal learning. This work, including the quality assurance of a growing diversity of programmes and education and training services and the provision of better information for learners, is an essential scaffold for the context and ambitions outlined in the HEA Consultation Paper, and signalled in the Progress Review and Priorities to 2021. QQI because of our unique role, takes a whole-of education and lifelong learning perspective.

QQI and HEA both share commitment to fostering and supporting enhanced system coherence in relation to access, transfer and progression.

QQI, access, transfer and progression policies and criteria as implemented- our contribution

QQI has statutory responsibility for determining policies and criteria for access, transfer and progression in relation to learners². Providers establish policies and procedures based on QQI policies and criteria. QQI monitors the effectiveness of procedures established by providers as a core objective in Cinnte³ and other provider reviews. QQI reviews the procedures as established and implemented by the Institution. These may or may not reflect a widening access and participation agenda.

HEA policy refers to publicly funded Institutions. Access data also can be enriched from practices in the independent sector which can be nimbler and more agile. Our engagement with the independent higher education sector provides for both programme and Institutional evaluation, including with reference to access, transfer and progression arrangements as implemented in programmes and services. It would be possible to add value to the national understanding of successful participation, progression and persistence informed by robust data, including for flexible and part time provision.

Pathways and Diversity

An inclusive higher education system is one which can equitably accommodate multiple cohorts of learners who will have achieved a diversity of awards, both as types and as qualifications. QQI aims to enable the development of more diverse types of qualifications (including micro-credentials) in the NFQ which will give learning achievement widespread

recognition including by employers and potentially open increasingly diverse access pathways to higher education. Apprenticeships also provide pathways through FET-HE. The challenge of access, efficiency, permeability and scarcity is discussed in the Green Paper on Qualifications, underlining the necessity of appropriate pathways for diverse learners.

Recent developments in practices in work integrated learning across all sectors, related validation of prior experiential learning and reflections on the learning from the Study of Mature Student Participation in Higher Education in relation to barriers and enablers for participation in the context of economic upturn and downturn, suggest that access policies and practices need to give greater consideration to workplaces as sites of learning.

Potentially this delivers all three of the identified support structures identified in the Study of Mature Student Participation in Higher Education, in-reach, out-reach and flexibility⁴ for a diverse learner cohort. Structured engagement with employers, sectoral bodies and social partners has the capacity to support greater inclusion and diversification and ultimately a universal design approach not just to teaching and learning, but to access itself.

Nationally a good deal has been learned about disrupted learning over our experience in responding to COVID. In 2020 the Council of Europe/UNESCO encouraged flexibility in arrangements for academic recognition for those whose educational progress was interrupted. Additionally, moving on from the Lisbon Recognition Convention, the Global Recognition Convention is coming into play with at this stage a small number of signatory countries. QQI supports these processes specifically through work with ENIC-NARIC and through its policy remit relating to the Recognition of Prior Learning (RPL). RPL is an important enabler in widening participation and enhancing access in this and other contexts, including for access, for the achievement of credit and for partial and complete awards.

Providers Access policies and procedures are not only about widening access but equally address the sometimes challenging fundamentals of standards for access and inclusion within programmes as a basis for successful participation rather than as means of mitigation of the impacts of the scarcity of resources.

A greater emphasis on transparency of standards or core competences required for successful participation, on the diversity of pathways and the opportunities of diverse routes (as signalled in the study on mature learners participation) could at minimum rebalance some pressure points across the system as a whole.

QQI as an awarding body

QQI is also an awarding body, making awards at NFQ level 5 and 6, some of which provide systematic ab initio access to certain programmes within higher education through the Higher Education Links Scheme⁵. While the operation of the scheme itself is transparent, both links and quotas assigned by HEIs to various programmes would benefit from increased transparency and an approach focused on the core competences at the entry point needed for successful participation in a programme.

This is particularly important both as the trend towards the adoption of quota-based application for admission increases and in the context of a rising demographic of school leavers competing also for full time participation in similar programmes.

Data infrastructure

The national data infrastructure informing targeted access considerations and underpinning the identification of candidates for whom additional support measures including funding is relevant, is complex, exposing potential risks of inequitable application and challenges in being person centred. QQI is willing to share data as appropriate.

QQI has a significant volume of data including relating to how learners participate, achieving certification over time in FET6. It is clear that disadvantaged learners participate in initial FET and are under-represented in higher level FET and HE; transition from FET to HE is more likely to occur from higher level FET qualifications, and therefore the FET transition from initial to higher qualifications is of interest within the broad concern to increase access and participation.

QQI is currently completing a review of standards at levels 1-4. This will renew pathways and create opportunities for more diverse progression routes than here-to-fore to intermediate levels within the Framework and the greater release of the 'talent pipeline' particularly among those target groups least likely to have experienced opportunity previously.

QQI has also commissioned an Evaluation of the Comparability of the Advanced Certificate and Higher Certificate Qualifications, both at Level 6 (publication pending). This study found that not all providers collate progression data, particularly in regard to the progression onto Level 7 for holders of AC qualifications. Better data is necessary if progression is to be optimised.

Recent papers on progression from FE by sub-groups of the Transitions Group⁷ and the IUA Access Steering Group can be built on within this plan but also support the proposition that further interagency research is necessary to inform the Access Plan from a lifelong learning perspective, including for those with VET qualifications. The work of the sub-groups demonstrates the effectiveness of collaboration and sharing of information on progression routes and practices. Further progress in access and widening of participation is within grasp, with appropriate recognition of learning, with increased permeability between FET and HE sectorally and with the diversification of awards. Models for bridging programmes do not necessarily involve yearlong major awards and should capitalise on experiential learning.

A culture of research and evaluation into access and participation

Because the widening participation agenda is complex and multidimensional, policy and practice must be evidence informed. Policymakers should commit to establishing and maintaining a comprehensive evidence base of what works to achieve greater social mobility and a widening of participation in higher education on a collaborative basis. There is little evidence to date of interventions and approaches being systematically evaluated in Ireland. Systematic reviews of existing research use explicit, accountable and rigorous research methods. Such reviews synthesise vast numbers of studies into a manageable form, increasing the reliability of findings. The results of systematic reviews of the international evidence available on relevant interventions should be available in accessible forms for decision makers to use as they review and plan. Systematic reviews can help

answer questions about the effectiveness of interventions, for example what is the evidence of the effectiveness of financial incentives, mentoring programmes, on-campus summer schools, or quotas for underrepresented groups, on widening participation in higher education. Such systematic reviews would also help to make the action plan more accountable and transparent. A good example of the methodology employed in a systematic review can be seen in the analysis undertaken by the Education Policy Institute. This systematic review presents a clear conceptual framework, includes criteria for what counts as evidence, specifies the search, screening and sorting criteria and the method for synthesising evidence.

Previous national access plans have introduced a strong evaluative culture. Given the significance of the agenda and the investment involved, it is imperative that decisions need to be based on the best available expertise and advice.

Interagency collaboration that examines the richness of the interaction of factors which create enablers and barriers to access and participation is an area of interest for QQI, e.g. in understanding better the impact of the contribution of programmes leading to awards on the Framework. Noting again, the Study of Mature Student Participation and CAO data, many of those progressing to higher education under different access streams have obtained QQI awards, with some achieving highly. It would be useful to disaggregate the elements which efficiently contribute to successful progression. QQI has observed growing commitment to universal design for teaching, learning and assessment; in parallel, an increasingly diverse range of specific access initiatives, funding programmes and actions which may risk fragmentation and place significant burdens on applicants penetrating schemes. Universal design for access is of interest to QQI.

Core research topics of shared interest with QQI might include e.g.:

how widening participation and student success measures are experienced by students and staff across tertiary education and training

whole-of-system implications for the equitable management of access from the strengthening of the National Framework of Qualifications; Diversity of modes, models and qualification types

international education and learners needs in the broader context of diversification and of the new internationalisation strategy

A desirable outcome of research and evaluation would be a set of principles to inform and guide future decisions around widening participation.

QQI would welcome opportunities for future collaboration in support of the development of diverse high-quality tertiary education opportunities that enable learners to reach their potential through achieving widely valued qualifications.

Submission 3.8 NDA

Introduction

The National Disability Authority (NDA) is the independent state body with a duty to provide expert advice on disability policy and practice to the Minister for Children, Equality, Disability, Integration and Youth, and to promote Universal Design in Ireland.

The Centre for Excellence in Universal Design (CEUD) is a statutory unit within the National Disability Authority. Its main areas of activity include the development and promotion of guidance, standards, education and awareness for Universal Design. Universal Design (UD) is the design of any environment, product service or information/communications technology so as to be readily accessed, understood and used by people, regardless of age, size, ability or disability.

The NDA welcomes the opportunity to submit advice to the Higher Education Authority (HEA) National Access Plan 2022 to 2026. This submission will describe in brief relevant considerations for the next access plan. Also provided, using the appendices, are statutory obligations relevant to the HEA and Higher Education Institutions (HEIs) during the 2022 to 2026 timeframe. Finally in the further reading section the NDA provides additional resource material on Universal Design (UD) and its application to learning and the built environment.

Data and statistics

The HEA reported on participation of underrepresented groups in their 'Progress Review of the National Access Plan and Priorities to 2021'.¹ This report stated that the 'data demonstrates positive findings with increases in participation rates across a number of the target groups, with particularly high increases for students with disabilities and among socio-economically disadvantaged groups²'.

An overall participation target of 8% for the participation of students with disabilities in higher education was set for the lifetime of the Plan and this had been exceeded by the Progress Review stage. At that point in the plan the overall participation rate of persons with disabilities had increased to 10%. The reported data described achievement of specific targets for students with physical mobility disabilities, students who were deaf/hard of hearing and students who were blind or visually impaired. While the increase in participation for those groups is to be welcomed, for higher education to be fully accessible the NDA maintains that targets can be more ambitious and include people across the spectrum of disability including persons with mental health difficulties, people with neuro-diverse conditions and people with intellectual disabilities and others. However, our core advice is that targets on their own are an insufficient instrument of progress. Through the lifetime of the next action plan the NDA recommends that a UD approach is used to increase access for all, including persons with disabilities.

In considering what targets to set the NDA advises that the HEA reflects on the following 2016 census data:

The unemployment rate amongst persons with a disability was 26.3%, more than double the 12.9% rate for the population as a whole.

Ireland's rate of youth disability benefit recipients was approximately 5% - well above the OECD average of 2% and was the highest of the OECD countries.

The 'not in employment, education, or training' status (NEET) rate for young people with a disability, at 23 %, is over twice the rate of young people without a disability at 10%.

13.7% of persons with a disability aged 15-50 had completed no higher than primary level education, compared with 4.2% of the general population.

Data from a forthcoming ESRI publication commissioned by the NDA illustrates that:

The proportion of persons with a disability with at least a post-secondary education level increased between 2004 and 2019 regardless of disability type.

The education gap for higher education between people without a disability and those with a disability increased over time, from 13 percentage points in 2004 to 18-percentage points in 2019.

The education gap persisted even when focussing on the younger age group of people aged 16 to 34.

These data suggest that encouraging persons with disabilities to access higher education must commence earlier in the education system. For persons with disabilities the gap in access to higher education can be addressed through a more structured and supported transition between secondary school and post school options, ideally through the continuation of the learner pathway established in the further education and training sector and with the provision of career guidance along that pathway. The NDA advises that the HEA examine whether there are areas where they could input into this transition period, for example, in relation to sharing experiences of successful students, and sharing information on the different routes to higher education.

NDA recommendations for the new National Access Plan

The NDA advises that the HEA reflect on how the additional €40 million allocated to higher education through the Programme for Access to Education (PATH), over the course of the previous national access plan has supported learners with disabilities. The learning should be reflected and built on in the current plan. Specifically, successes related to increased effort in outreach and recruitment of prospective students should be built upon. Learning from innovations funded through the Fund for Disabled Students such as those related to UD and UDL should also be incorporated and good practice disseminated to increase application of UD principles across the system.

The NDA recommends the following actions for inclusion in the 2022 to 2026 action plan. These actions are necessary for higher education to become a more realistic option for more students with disabilities. The recommended actions, which reflect the questions set out in the HEA background document, are derived from NDA consultations with persons with disabilities and from the work of the CEUD on UD in the further education and training and higher education sectors and are as follows:

Develop and articulate a vision statement that promotes the inclusion of all persons with disabilities

Develop and articulate a longer term vision for a fully universally designed higher education sector

Include Universal Design (UD) and Universal Design for Learning (UDL) as the core methodologies that underpin the design and delivery of higher education to the benefit of all learners, including persons with disabilities, as well as people whose first language is not English, have low literacy levels, older / younger people and people of a wide range of abilities.

The Centre for Excellence in Universal design (CEUD) promotes UD and UDL as a benefit for all rather than an additional cost to support “the few”.

Promote realisation of an accessible built environment such as ‘a whole of campus approach’ that ensures the built environment can be accessed, understood and used, to the greatest extent possible by all people, regardless of age, size, ability or disability. Without accessible buildings and campuses, people with disabilities will not have the opportunity to exercise their right to education. Applying universal design principles in the design of new buildings and their environs, as well as during improvement works to existing buildings should be included in the HEA access plan as an essential element of embedding mainstreaming within HEIs.

Give consideration to the particular requirements of mature students with disabilities seeking to access higher education⁴. Using an approach that responds to the diverse needs of learners is important to achieve full inclusion. Things that may specifically benefit this group may include more access to part-time or evening courses.

Develop more ambitious targets to increase the proportion of persons with disabilities in higher education, to include students with other disability types beyond the current physical and sensory disabilities currently included. There is learning that could be applied more widely in the sector such as through the autism friendly university initiative in DCU, and specific programmes for students with intellectual disabilities in TCD and NUIM.

Incorporate the lived experience of persons with disabilities into the planning, implementation and monitoring of this access plan for example, commencing a process of consultation with the 200 plus students with disabilities that have received the 1916 bursaries. These students have unique insights into the participation journey. A co-designed approach with these students with disabilities, would be in line with obligations in the UN Convention on the Rights of Persons with Disabilities (UNCRPD)

The Learner Pathway concept is already in place in the Further Education and Training sector and is a welcome mechanism to ensure prospective students with disabilities can identify a pathway to higher education for themselves. Such a pathway can address the nonlinear routes through education for some people with disabilities. This is where additional supports such as career guidance and clear sign-posting of transitioning points are valuable.

The NDA, as the statutory advisory body on disability policy and practice, welcomes the opportunity to submit these recommendations for the HEA 2022 to 2026 national access plan. We would also welcome an opportunity for further engagement and discussion with the Higher Education Authority.

Appendix One

The NDA recommends that the following statutory obligations and actions plans are considered in the development of the HEA access plan.

UN Convention on the Rights of Persons with Disabilities

Ireland ratified the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in March 2018. Article 24 of the Convention specifically protects the right to inclusive education. The National Access Plan 2022 to 2026 can drive this commitment and reference the UNCRPD.

The National Disability Inclusion Strategy

The National Disability Inclusion Strategy 2017–2021 (NDIS), seeks to ensure that a whole-of-government approach is taken to disability issues. There are two actions that are relevant to higher education:

Action 31: We will consider how best to build on and progress work completed to date to facilitate smooth transitions into, within and out of education on a cross departmental and agency basis.

The HEA through agency collaboration with SOLAS can form part of the transitions solution. This can be achieved through the adoption of the learner pathway already underway in the further education and training sector.

Action 42: We will promote participation in third level education by persons with disabilities.

As recommended earlier the NDA advises that targets are set that are more ambitious, include students with a variety of disabilities and that these targets are monitored.

Compliance with Part M 2010 of the Building Regulations

Taking a proactive approach to improving the accessibility of public buildings, including educational buildings, in the ownership, management or control of public bodies, is a requirement under Section 25 of the Disability Act, which states that ‘a public body shall ensure that its public buildings, are as far as practicable, accessible to persons with disabilities’.

Section 25 requires the upgrading of older public buildings so that they comply with Part M of the Building Regulations. Under Section 25, public bodies are required to bring their public buildings into compliance with Part M 2010 by 1st January 2022.5

Section 25 applies to Department buildings, schools and colleges operated by Solas, HEA, Education Training Boards, and schools owned by the Department which are leased to operating bodies.

Compliance with Part 5 of the Disability Act 2005

Part 5 of the Disability Act 2005 requires public bodies to have a minimum target of 3% of their workforce be persons with a disability. The NDA recognises that the past Part 5 returns for the higher education sector were submitted under the Department of Education. The NDA advise that it will be important for the HEA to continue maintaining compliance with Part 5 of the Disability Act 2005 and to note that the minimum target is set to increase to 6% by 2024.

Compliance with the European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020

This Directive was transposed into Irish law on September 23rd 2020 and requires public sector bodies, including higher education institutions, to take necessary measures to ensure their website and mobile applications comply with the Web Content Accessibility Guidelines. The Directive also requires that public bodies publish and maintain an Accessibility Statement that provides detailed information on the accessibility their websites, steps taken to ensure compliance and contact details for website users to report issues and request assistance. The NDA advice that the HEA reviews its website, produce an accessibility statement and takes steps to ensure it meets the necessary requirements. The scope of the Directive also covers

Learning Management Systems and their content. The NDA will be the official monitoring body for this Directive and Regulations and is due to submit its first report in this regard to the Department of Communications, Climate Change and Environment by 23rd December 2021.

Disability Awareness Training

The NDIS contains a commitment to “provide disability awareness training for all staff”. The NDA advises that disability awareness training is carried out among all staff in the HEA. The NDA has a disability awareness training e-learning module which is available to all public sector bodies.

Irish Sign Language Act

All public bodies have obligations under the Irish Sign Language (ISL) Act. The Act was signed into law in December 2017. Irish Sign Language (ISL) is now a recognised language. Under the Act, public bodies are required to provide free ISL interpretation to people using, or seeking access to, statutory entitlements and services. The Act is fully commenced since December 2020. The National Disability Authority advises that the HEA and constituent HEIs take steps to ensure that access to services⁸ are provided through ISL as required by implementation of this Act.