

## Submission 4.20 [AHEAD](#)

AHEAD is an independent non-profit organisation established in 1988 working to create inclusive environments in education and employment for people with disabilities. The main focus of AHEAD's work is access to and full participation in further education and training, higher education and graduate employment.

The Higher Education Authority has provided a core grant to support our activities promoting inclusion in higher education since the mid-1990s.

We work directly with students, with staff in FET and HEIs, and with policy makers in order to achieve our aims. With regards to graduate employment, we work directly with a network of Irish employers to provide paid mentored work placements for graduates with disabilities. If you are interested in finding out more about our work and how we build towards our mission, please view this 4-minute animated summary video.

### About this Submission

This Submission was developed by AHEAD in response to the consultation on development of a new National Access Plan 2022-2026. Our recommendations and rationale are supported by in-depth research of current discourse, literature and policy, and informed by prolonged dialogue with key actors and stakeholders, most importantly, students with disabilities.

This submission is predicated upon and advanced by:

- Research of the literature of the social context of disability and its links to poverty, low representation of students with disabilities in some areas of academic life, and access to progression and employment for this target group.
- AHEAD's knowledge, understanding and experiences engaging with students with disabilities, which gives us a unique insight into the learning narrative of these students. Our work is also informed by our own research on the experiences of students with disabilities and consistent engagement with the AHEAD/USI Students with Disabilities Advisory Group.
- Continuous monitoring of the participation of students with disabilities in Higher Education and their engagement with support services, underpinning our work with up-to-date evidence and data. AHEAD have been monitoring student engagement with higher education disability support services since 1993/94 and reporting the findings in now annual research reports.
- Human rights instruments ratified by the State that situate health, education and accessibility as equal entitlements and legislation concerning equality and accessibility.
- Engagement with key actors in the teaching and learning, disability and access departments of HEIs as well as key national stakeholder bodies and steering groups.

This submission provides a brief outline of the importance of the National Access Plan for students with disabilities and is underpinned by three core recommendation themes that call for a re-framing of the Plan to fully subsume the whole college experience of target groups.

Throughout this submission, you will find quotations from students taken from three sources:

1. The as yet unpublished AHEAD Learning from Home Survey conducted with almost 800 students with disabilities in FET and Higher Education in Apr 2021
2. Research on participation of students with disabilities on Erasmus conducted as part of the EPIFME project
3. A feedback survey from the AHEAD/USI Students with Disabilities Advisory Group taken to inform AHEAD's submission on the review of SUSI

### Introduction and Summary of Recommendations

Huge strides have been made regarding access of people with disabilities to higher education in recent decades, due in no small part to the creation and monitoring of the National Access Plan, and the commitment of on-the-ground practitioners in implementing its vision.

The last 10 years alone has seen a more than 220% increase in engagement with HEI disability support services (AHEAD, 2020). And yet people with disabilities remain significantly less likely to be in employment than their non-disabled counterparts. The recent European Commission Country Report for Ireland 2019 found that Ireland has one of the lowest employment rates for people with disabilities in the EU (26.2% compared to 48.1% in the EU as a whole in 2017) and one of the highest gaps between people with and without disabilities in employment (45.1 percentage points). Higher education is a vehicle that can transform the lives of people with disabilities by enhancing employment opportunities, enabling them to become valued, promoting well-being and informing a greater standard of living with autonomy, choice and agency.

But this can only be achieved if the whole system is intentionally designed to enable people with disabilities and other target NAP groups to engage fully in all aspects of the higher education experience and benefit from the positive graduate outcomes which follow. 'Access' to higher education is not enough to realise the constitutional right to equality for people with disabilities and the state's responsibilities on access to employment under the United National Convention on the Rights of People with Disabilities (UNCRPD). The next National Access Plan requires a shift in approach to address more broadly the transitions to and from higher education, the state supports that underpin student engagement in higher education, and the experience of our target groups of teaching and learning, social engagement, extra-curricular activities and academic progression.

Traditionally, access to and participation in higher education of the NAP target groups has been facilitated predominantly by specialised HEI services providing targeted outreach and individualised 'retro-fit' support which often helps learners to navigate barriers which exist in the environment and systems. Continued support for these overstretched support services (AHEAD, 2020) is vital to facilitate inclusion, but the changing demographics inherent in the success of recent National Access Plans means that a stronger focus needs to be placed on removing those barriers and making inclusion everyone's business. In the case of students with

disabilities for example, and the increasing number of individual accommodations required to support them, this is both a moral and financial imperative for the system.

Additionally, soon to be published AHEAD research on the 2019/20 academic year shows that a minimum of 4.8% of new entrant students have a disability but choose not to disclose it and register with support services. And so, in order to ensure every student can succeed, a much greater focus needs to be placed on removing barriers for all and building in more flexibility, accessibility and choice to higher education design and delivery, so that the huge variability of learners in higher education can benefit from a system that bends to their needs.

COVID 19 has posed significant challenges for the higher education system, yet in the process, it has also widened our understanding of access and inclusion. It has forced us to re-consider how we facilitate accessibility to learning and assessment and brought to the fore barriers for many students which long existed but remain under-discussed.

As well as mental health challenges arising from Covid-19 for students who have endured isolation and been deprived of the Higher Education social experience (Timonen, Greene and Émon 2020), the pandemic highlighted the impact of the digital divide and social/spatial inequality in the ability to learn effectively from home (AHEAD 2020). In the soon to be published AHEAD Learning from Home survey 2021, 46% of higher education undergraduate students with disabilities say they are still not coping well with learning from home – a marked improvement down from 59% in 2020 but concerning nonetheless. Yet there are positives to take from what we've learned during the pandemic too.

The state's responses in supporting learners through the increase of the Student Assistance Fund, and the introduction of the Laptop Scheme, the Covid-19

Contingency Fund and the Mitigating Educational Disadvantage Fund were swift and effective measures which often addressed already-existing barriers and must be retained post-pandemic.

Equally, COVID 19 has advanced some practices in Irish Higher Education Institutes that are more informed by accessibility, flexibility, choice and autonomy. Results from AHEAD's soon to be published "Learning from Home 2021" research shows that experiences were mixed, but that many students were satisfied with how their institution delivered modules during the pandemic. In particular, students were positive in their reaction to practices that were indicative of a Universal Design for Learning (UDL) approach, such as those concerning choice of assessment formats. One third of students with disabilities actually rated their experience of the move online as a more accessible learning experience for them than on-campus learning, highlighting the need to offer more choice in how and when students engage in learning.

Of ten priorities listed for improving access and inclusion for students with disabilities over the next 5 years, the top two rated priorities by students were to "ensure all classes/lectures are recorded and captioned so students can watch them back later" (88% rated as high or very high priority) and to "provide more choice for students in how they are assessed" (78% rated as high or very high priority). Therefore, we would suggest that the pandemic has created an ideal opportunity to adopt and mainstream UD and UDL approaches, and continue to foster these more accessible and flexible learning and teaching techniques as normative practice.

Building a student-centric, sustainable system infused with inclusivity, flexibility, accessibility and choice which can cater for the broad variability of learners in our higher education

population is a challenge, but thankfully, Universal Design (systems and environments) and UDL (teaching and learning) offer us evidence-based, internationally recognised principles, guidelines and practices which can help us to mainstream access for all and make inclusion everyone's business. AHEAD is heartened by Minister Harris' support for UDL, as evidenced by his comments about UDL being the embodiment of "human rights in the classroom" at the recent Climbing the UDL Ladder conference hosted by IT Sligo.

It is becoming increasingly clear that alongside making inclusion everyone's business, there is an onus on the NAP to be reframed to epitomise the 'whole college' narrative and time-frame, including transitions to and from higher education, and the full experience within it. Therefore, AHEAD's submission is underpinned by three central themes from which our core recommendations will emanate;

1. Mainstreaming access and participation through Universal Design (UD) - Framing the mainstreaming of inclusivity, flexibility and accessibility through UD and UDL within the NAP, in order to create a sustainable, student-centric HE system where inclusion is everybody's business. Under this theme, AHEAD is calling for the universal design and UDL to be recognised as existing evidence-based, quality-assured and internationally recognised frameworks which can support the mainstreaming of inclusion for all students and especially, the NAP target groups. This recognition could take the form of

- referencing UD in the title of the new plan or placing it as an over-arching theme supporting student success. Specific recommendations AHEAD is making under this theme include: • the development UD for HE Charter linked to institutional access to research funding streams – similar to the Athena Swan model.
- the delivery and monitoring of national, role-based training around UD, UDL and accessibility.
- building UD for HE as a high-level indicator in the HE performance framework and establishing it as an object of the HEA within the forthcoming new governance legislation.
- the establishment of UD Officers with a senior reporting line in all HEIs, to co-ordinate the cross departmental implementation of UD and UDL.
- delivery of a national approach to lecture recording and captioning to facilitate greater flexibility in how students engage in learning. Increased commitment to providing more hybrid and modular study options and facilitating students to engage in programmes over longer periods of time.
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2. Shifting NAP focus from access to transitions, experience and success - Promoting student success for target groups by making a strategic commitment to ensuring they can engage and progress in all aspects of college life, advancing cultural capital and strengthening graduate outcomes. This includes strategic approaches to inclusion in student union/social activities, Erasmus, work placement and progression to postgraduate study. Specific recommendations AHEAD is making under this theme include: • improvements in data collection and monitoring to improve our understanding of the engagement of target groups

across fields of study, their graduate outcomes, their progression to postgraduate study and engagement with Erasmus study abroad.

- national targets set for participation of students with disabilities in postgraduate study and the provision of dedicated scholarships for postgraduate researchers with disabilities.
- national targets set for participation of students with disabilities in Erasmus and a dedicated inclusion officer appointed in the national Erasmus agency to support institutions in organising supports abroad for students with complex needs.
- provision of national funding stream for student unions to provide accessible social and extra-curricular activities (e.g., for provision of interpreters/captioners, costs of subtitling or accessibility training for SU Officers)

3. Targeted, quality-assured, supports and outreach – The work and commitment of disability and access services has been vital in implementing the vision of the National Access Plan. A holistic model of inclusion requires both universal design for all and the provision of high quality, targeted funding and supports for those who need them. Specific recommendations AHEAD is making under this theme include: • increased resourcing for dedicated support services through an increase in the access weighting applied in the Recurring Grant Allocation Model

- provision of funding for the securing of medical screening and reports required to verify disability for DARE and disability support service registration

- whole of government, inter-departmental collaboration on the provision of state funding to reduce barriers to accessing support for example, in the provision of funding for personal assistance and the access to disability allowance, the medical card and vital secondary supports

- Recognition within SUSI of the proven added cost of living and learning with a disability, provision of the student grant for part-time learners and increased flexibility in grant provision for modular study

- national approach to quality assurance of HEI support services to ensure that supports recommended by services are student-centred and applied with quality and consistency by academic staff and other key actors in the process

- increased focus and national approach to transition planning for students with disabilities in to and out of higher education to ensure continuity of supports on entry and preparation for employment on exit

- addition of students with intellectual disabilities as a NAP target sub-group and a whole of education approach to access for consistently underrepresented students with sensory disabilities (blind/deaf), while also providing added resources, upskilling and supports to disability and support offices to accommodate this.

These themes are expanded and elaborated on in the next sections of this submission with detailed rationale and an evidence base provided.

#### Full Recommendations and Rationale

This section of the submission goes in to greater detail on the themes and recommendations outlined in the introduction and provides further evidence and rationale to underpin the recommendations.

#### Theme 1: Mainstreaming access and participation through Universal Design (UD)

Universal Design (UD) is defined as “the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design” (UN, 2017). The principles of UD are evidence-based and internationally recognised, and can guide us in building more inclusive and accessible higher education physical and digital environments which are student friendly and easy to navigate, as well as helping us to offer more flexible modes of engaging with higher education.

Universal Design for Learning (UDL), a more specific framework focussed on addressing the variability of our learners’ strengths and needs in teaching and learning practice, offers a more focussed framework for educators to design academic experiences with more flexibility, accessibility, student voice and choice built in at the point of delivery.

The UDL framework is based on decades of research in neuroscience and the learning sciences, and its student-centric guidelines and checkpoints, offer international best practice in flexible, inclusive and sustainable educational practices (Hall et al. 2012, He 2014, Al-Azawei, Serenelli & Lundqvist 2016).

UD and UDL are two of the few existing internationally recognised, evidence-based frameworks that can help us to lower barriers to access and participation in higher education for all target groups of the National Access Plan, while providing benefits for all learners in the process.

The Center for Applied Special Technology (CAST), who founded the concept of UDL, define it as “a framework that addresses the primary barrier to fostering expert learners within instructional environments: inflexible, “one size-fits-all” curricula”. As Osborne, Gallacher and Crossan (2007:10) observe, “it is not simply a question of the preparedness of students for the HE experience, though clearly many are not prepared for the demands of a still largely inflexible system, but it is also the degree to which institutions respond to the challenges of diversity”.

UDL presents a structure for designing instructional environments and activities that take into account the varied ways in which all students learn and express their learning, (Rao & Mao 2016). International literature finds that UDL implementation can reduce stress, enhance success, social presence and satisfaction through building in more flexibility, autonomy, choice and communication. The incorporation of a UDL lens for the NAP to guide the design of higher education pedagogical

practice would help standardise, normalise and internalise inclusive learning (Kumar and Wideman 2014).

UDL as a mechanism that pushes inclusion into the mainstream is also cost-effective. As Houghton & Fovet (2018) state: The process of setting accommodations/support for each

student, for each course, for each semester is seen as an inefficient and ineffective approach to course delivery.

The recommendations under this theme are as follows:

1.1 Develop UD for HE Charter linked to institutional access to research funding streams – similar to the Athena Swan model. UD and UDL should be adopted as a ‘whole system’ approach to mainstreaming access and inclusion in Higher Education. A “whole systems approach” embeds “the necessary changes in institutional culture, policies and practices”. This approach espouses considering the whole educational environment, and designing HE experiences where the whole person is recognised, within learning-friendly environments which are fully accessible and “where everyone feels safe, supported, stimulated and able to express themselves” (NDA, 2020)

AHEAD recommends to support quality implementation of this approach, the HEA develop, in collaboration with the sector, A UD for HE Charter, which institutions have to achieve an award in by a specified date in order to retain access to national research funding streams – similar to the Athena swan model. This model would both support institutions to identify areas of positive action to works towards sustainable and inclusive UD and accessibility standards (such as the Web Accessibility Directive), and provide national oversight on the mainstreaming of access and inclusion. Equally, it would have the dual purpose of enabling diverse students to make more informed choices about their place of study.

The development of the Charter could build on existing national and international good practice indicators in UD and UDL policy and practice, such as those developed by UCD in their University for All Toolkit and those adopted by CAST regarding institutional accessibility. Ultimately, this approach will lower barriers to learning for all students and enable more flexible and equitable approaches to how students engage with learning and demonstrate their ability.

“This is the 1 element of college life I'm really not looking forward to. Going back to exams that are purely memory based when I have a neurological condition that clearly impacts my memory, focus and energy levels. It just upsets me knowing that I'm ultimately going to end up with a worse degree than I'm capable of.” – student, Learning from Home Survey 2021

1.2 Deliver and monitor national, role-based training around UD, UDL, disability awareness and accessibility. If we seek to build a system ‘where inclusion is everyone’s business’, then it is vital to promote of a national understanding of Universal Design for Higher Education through supported, role-based training for all staff. This national role-based training and guidance on digital accessibility, disability awareness, universal design and UDL should be delivered to all staff in higher education as appropriate to their role, and institutional take-up monitored in the strategic dialogue process.

With cost-effective, quality scalable models of CPD provision already in operation, such as the National Forum’s UDL Badge developed by AHEAD and UCD Access and Lifelong Learning, meaningful training can realistically be offered to all teaching staff in higher education over the lifetime of the next National Access Plan, and easily embedded in the curriculum of HEI lecturer training programmes and training programmes for primary and secondary teachers.

When implemented as a ‘whole college approach’, UDL enables and informs well-being, success, increased cultural capital and retention, (Rath 2020) and a coordinated approach to professional development is required to achieve this.

“Disability students have to fight for supports and are made to feel they are complaining or demanding, which is just them trying to get the supports in the first place. A lot of places also say there is training staff can access, but it’s not enforced. It should be enforced and audited.” – student, Learning from Home Survey 2021

1.3 Build UD for HE in as a high-level indicator in the HE performance framework and establish it as an object of the HEA within the forthcoming new governance legislation. To support increased institutional focus on UD and UDL in higher education and national oversight of its implementation, AHEAD recommends that the forthcoming governance legislation outlines the promotion of Universal Design in higher education as a specific object of the Higher Education Authority (in Head 8 (1) of the tabled bill), and that UD and UDL are included as high-level indicators in the next update of the HE Performance Framework.

This will incorporate more flexibility, accessibility, voice and choice into the fabric of higher education provision and encourage a more transparent approach to the implementation of UD and UDL.

1.4 The establishment of UD Officers with a senior reporting line in all HEIs, to co-ordinate the cross departmental implementation of UD and UDL. The establishment of a senior officer in every HEI, whose role it is to coordinate the collaborative, cross-campus, dialog and effort required to shift policy and practice around UD and UDL, would provide a local and national touchpoint for implementation of UDL. This role could incorporate the coordination of cross-campus steering groups to lead UD efforts, the promotion and monitoring of engagement with role-based training such as the UDL Badge, and the reporting to the HEA on UDL implementation efforts.

To be effective, its vital that such Officers are not based within Access departments (recognising UDL is for all), and have a senior remit in the institution and a senior reporting line. It is essential that HEIs are funded to hire quality, experienced candidates for these roles, and establishment of these Officers could be encouraged via the forthcoming governance legislation or through the HEI performance dialog.

This would help to foster a more consistent institutional and national approach to UDL practice and a ‘college wide’ approach to inclusion that surpasses the narrower focus of access. It is important to state that recently, some institutions have already taken the lead and appointed such officers with senior reporting lines, but a national approach would support sustainability and consistency of this model.

1.5 Coordinate a national approach to lecture recording and captioning to facilitate greater flexibility in how students engage in learning.

While the Covid-19 pandemic presented unprecedented challenges for students and institutions alike, the new modes of learning provided greater levels of accessibility for some students. Evidence gathered from the Student Survey and the yet to be published AHEAD Learning from Home survey highlights that some of the emergency measures implemented to support learning from home were broadly welcomed by students. The provision of captioned, recordings of lectures has been repeatedly cited by the AHEAD USI Students with Disabilities Advisory Group as a vital measure to support flexible engagement with learning and revision.

The importance of this was evidenced in the survey where 87% of students with disabilities rated lecture recording and captioning as a high or very high national priority in terms of



improving access and inclusion for students with disabilities in further and higher education – the highest rating of 10 options provided.

“I also think having lectures be recorded helps with days when I am too sick to go into college, but I can catch up the next day. It also helps with my sensory issues to have the option to turn on captions on videos, which is something unique to learning at home.” – student, Learning from Home Survey 2021

1.6 Develop a national commitment to providing more hybrid learning options, more flexible modes of study and modular study options which facilitate students to engage in programmes over longer periods of time.

In order to lower barriers to access and engagement in higher education, the system needs to ensure that it provides flexible modes of study which can meet all student’s needs. This includes increased provision of online, hybrid and hy-flex learning as a standard part of programme delivery, increased provision of part-time options and ability to engage with degree programmes over longer periods of time via modular study.

The need for increased flexibility to meet all learner needs is highlighted by the findings of the Learning from Home Survey 2021 which highlight that while approximately half of students with disabilities wish to return to mostly face to face learning post pandemic, 39% wish to have a mix of in-person and remote learning and 9% wish to remain fully online.

It’s also vital to ensure going forward, that students who engage in part-time or modular study have access to the same financial and institutional supports that full time students can avail of e.g., SUSI.

“I would like it to be a mix of in person and online. The assessments should be more blended. Interactive, multiple choice, quizzes, whatever, cater to all students, their mental health needs above all else is the most important thing.” – student, Learning from Home Survey 2021

1.7. Address the Digital Divide with a more sustainable approach to training, funding and technology provision. Many measures introduced by the state to address the digital divide in higher education – such as the Laptop Scheme – were notable and effective. The AHEAD Learning from Home 2021 survey for example shows that the percentage of students with disabilities who had their own, non-shared laptop to engage with learning from home rose from 76% to 87% between April 2020 and April 2021, with many commenting that they received a laptop through the scheme. The pandemic has brought this existing disadvantage to the fore and it is essential the funds remain in place to ensure that technology barriers are lowered for disadvantaged students going forward.

Equally, the importance of digital literacy and benefits of assistive technology in learning were highlighted as a result of 100% online learning for most. Bespoke training for students should be provided to support learning technology use and to understand the potential benefits of assistive technologies. This training should form part of the standard induction programme for higher education to build capacity at the point of entry. Assistive technologies are crucial to leverage UDL approaches and foster more autonomy and choice for students in how they consume knowledge.

1.8 Build a Coherent Approach to Incorporating the Student Voice in Design and Delivery. Promote a consistent approach to consulting diverse students, including those with disabilities, in the design and delivery of higher education programmes, and under new Equality, Diversity

and Inclusion initiatives, hire a greater diversity of staff profile at all levels in HEIs, including staff with disabilities. There should be a diverse range of appropriate input at decision-making levels in all HEIs, including students/staff with disabilities. Therefore, the interests of students and staff with disabilities are heard, understood and considered in decision making.

Theme 2: Shifting NAP focus from access to transitions, experience and success.

Previous National Access Plans have traditionally focussed predominantly on access to higher education, and many gains have been made for target groups of the NAP as a result of the tangible targets and measures set. This is evidenced by the increase of more than 220% in the number of students engaging with Higher Education Disability Support Services in the last ten years (AHEAD 2020).

However, data on the experience in higher education of NAP target groups, their progression and graduate outcomes is scarce. The recent European Commission Country Report for Ireland 2019 found that Ireland has one of the lowest employment rates for people with disabilities in the EU (26.2% compared to 48.1% in the EU as a whole in 2017) and one of the highest gaps between people with and without disabilities in employment (45.1 percentage points).

Research highlights that it is vital to ensure that people with disabilities can access and engage in all aspects of the higher education experience in order to boost employability and engage successfully in the labour market (Rath 2020).

That is why it is important that the targets and objectives of the next NAP are widened to incorporate the 'whole college' narrative and not just equity of access, and that data systems are put in place to ensure we can measure the engagement of the target groups in the whole college experience.

The NAP should promote student success for target groups by making a strategic commitment to ensuring they can engage successfully in all aspects of college life, to advance cultural capital and strengthen employment outcomes, including student union/social activities, Erasmus, work placements and postgraduate study. This will enable us to advance student success and boost graduate outcomes for the NAP target groups, including students with disabilities.

2.1 Improve national data collection and monitoring to build our understanding of the engagement of target groups across fields of study, their graduate outcomes, their progression to postgraduate study and engagement with international mobility programmes. The HEA have done commendable work in recent years concerned data collection and analysis in higher education to expand our understanding of the impact of socio-economic disadvantage in terms of access to higher education and graduate outcomes. As part of a concerted effort to reframe the NAP to explore the HE narrative for target cohorts beyond access, there is now a need to explore further expansion and disaggregation of data collection and monitoring to give us a greater understanding of the HE experience of NAP target groups, their engagement with all aspects of college life and their graduate outcomes. This includes working towards building a system which can track the participation of students with disabilities in international mobility, their progression to post graduate study and their employment outcomes on graduation.

2.2 Set national targets for participation of students with disabilities in postgraduate study and develop dedicated scholarships for postgraduate researchers with disabilities. Existing data from AHEAD on engagement of students with higher education disability support services

indicates that participation in postgraduate study remains worrying low. While 7.1% of the undergraduate population disclose and register with such services, only 2.4% of postgraduate students do so (AHEAD,2020). AHEAD recommends that tangible targets for participation of students with disabilities in postgraduate study are set in the next National Access Plan. A targeted scholarship fund for postgraduates with disabilities should be developed (similar to the existing women-in-research funds) to support increased participation at this level. Equally, the Department of Further and Higher Education should engage in cross-departmental collaboration to remove financial barriers regarding consistent access to vital state supports which facilitate engagement with postgraduate study (e.g., to ensure vital supports such as the medical card are not removed on receipt of a PHD stipend).

2.3 Set national targets for participation of students with disabilities in Erasmus and a dedicated inclusion officer appointed in the national Erasmus agency to support institutions in organising supports abroad for students with complex needs. International research has conclusively demonstrated the many benefits associated with studying abroad. These benefits range from higher academic achievement, increased language skills and personal confidence, to improved employment opportunities (European Commission, 2019, Teichler & Janson, 2007).

Studies in the United States of America suggest that this impact is magnified for underrepresented groups. Engel's (2017) study for example, indicates that the impact of a study abroad period results in higher four-year graduation rates and that the correlation between study abroad graduation is significant for minority students.

Higher education ministries collectively set a target for 2020 that at least 20% of graduates in the European Higher Education Area (EHEA) should have engaged in study or training abroad, a commitment which was reaffirmed in the 2020 Rome Communiqué.

However, for students with disabilities, while much work has been done to attempt to increase participation in recent years, statistics show that they are still significantly underrepresented in international mobility programmes (European Commission/EACEA/Eurydice, 2020).

The European Inclusive Mobility Framework published by the EPIFME project in 2021 calls on ministries of education and National Erasmus Agencies to “install a systematic and robust approach to gathering data about the participation of disadvantaged, vulnerable and underrepresented students in different mobility programmes” and to set and monitor target for participation. It also calls on National Agencies to provide “targeted financial support and support services for disadvantaged students”, which could include “provision of alternative format

application forms on request, support with the organisation and funding of a preparatory visit to the host institution, support to develop an accurate estimation of added disability-related costs required for some grant applications such as the Erasmus+ additional inclusion Grant.”

Appointing a dedicated Inclusion Officer within the National Erasmus Agency would mean capacity exists to provide this support to both students and institutions.

“The problem is you have to calculate all costs before you go. The total amount with the explanation for your calculation is part of the application process and then you have to collect all invoices at your host country. If expenses are higher than calculated before, you have to pay this from your own pocket. If your expenses are lower than calculated, you have to pay the money back. The reality is you always have some unexpected costs which you hadn't included

in your calculation before, so you have to calculate the worst-case scenario to have some space for unexpected costs.” – EPFIME Student Research Participant

2.4 Monitor participation across fields of study and introduce measures to address underrepresentation in identified fields. AHEAD research indicates that in comparison to the overall study body, students with disabilities are consistently underrepresented in some fields of study and overrepresented in others. For example, in ‘Arts and Humanities’ which research shows has the lowest graduate employability outcomes across all fields (HEA 2020:57), students with disabilities are overrepresented with 22.3% of all students with disabilities undertaking programmes in this field in comparison to just 14.1% of the total student population (AHEAD, 2020). However, in other fields linked to stronger employment outcomes such as ‘Health and Welfare’, ‘Business, Administration and Law’ and ‘Education’, students with disabilities are notably underrepresented (AHEAD, 2020)

To deliver on a plan that looks at the whole college experience and the graduate outcomes of target groups, consistent national monitoring of this data should take place, with targeted measures introduced to address underrepresentation.

2.5 Prioritise the social and civic engagement of students with disabilities in order to create a college climate in which students with disabilities can socially engage, have their voices heard within a space for meaningful dialogue, be valued and feel included in the student body (Rath 2020). In this way, the ‘whole college’ experience will be enhanced for this cohort. Students who feel they belong in their place of study are less likely to withdraw. Engagement with clubs and societies, volunteering, work placement and civic engagement are all crucial in the building of both social and cultural capital, and therefore in increasing employability and graduate attributes (Rath 2020).

Key in facilitating this is to ensure that the Fund for Students with Disabilities is expanded to cover supports delivered to engage with extra-curricular and volunteering activities e.g., personal assistance hours to support this engagement.

2.6 Provide of national funding stream for student unions to provide accessible social and extra-curricular activities (e.g., for provision of interpreters/captioners, costs of subtitling or accessibility training for SU Officers). Currently many students with disabilities do not have the opportunity to engage with student union activities through a lack of understanding of accessible practices, and a lack of funding to cover the costs of building accessibility into student events and activities. The creation of national fund available to student unions, clubs and societies to support accessibility in these activities would remove the financial barriers and enable clubs and societies to cover costs like subtitling of videos, live captioning events or the provision of accessible adapted sports equipment. Additionally, encouraging Student Unions to have dedicated Disability/Accessibility Officers (some so already) would provide a local focal point for information provision, training and guidance to clubs and societies on accessibility and inclusion.

“No subtitling of student union communications. I find these helpful when I'm having a bad day as my cognitions are affected” – student, Learning from Home Survey 2021

Theme 3: Targeted, quality-assured, supports and outreach

The last 10 years alone has seen a reported 220% rise (AHEAD, 2020) in the number of students with disabilities engaging with disability support services. All staff working in Disability Support

and Access Services in higher education should be commended for the great strides made in recent years in terms of increased access. The increases have been achieved in no small part down to the work of these services concerning outreach and support for target NAP groups.

However, the impact of this huge demographic change on the system of support provision to this cohort needs close examination, as support services struggle to meet the needs of rising numbers without the resources to match. Our research indicates that there has been a 37% rise in the number of students with disabilities per disability support worker in the sector in the last 7 years and support staff allude to being over-burdened and under resourced (AHEAD 2020).

72% of respondents alluded to a lack of resources to collaborate with other departments on embedding inclusive practice on campus, undermining the effort to create a 'whole college approach to inclusion'. A holistic model of inclusion requires both universal design for all and the provision of high quality, targeted funding and supports for those who need them and Disability Support and Access Offices have an important role to play in realising that model.

A coherent approach to transition planning and informed guidance for students with disabilities should play an important part in achieving consistency of supports within this model and ensuring students make informed choices pre-entry.

Additionally, targeted, barrier free state financial/medical supports for students to engage in higher education which recognise the proven added cost of living and learning with a disability are required to reduce barriers and increase participation.

3.1. Provide increased resourcing for Disability and Access Services in line with changing demographics of higher education. As evidenced above, support and funding for these services has not increased in line with the growth in numbers engaging with them, yet they remain a vital cog in achieving a holistic model of inclusion. Increased staffing resources could be provided through direct funding or through an increase the weighting for access metrics within the next update of the Recurring Grant Allocation Model for Higher Education, signifying the increased importance of access and inclusion in higher education.

Increasing support for these services would enable them to provide quality assured individual supports for students with disabilities, as well as sharing their knowledge and expertise on accessibility and inclusion across campus in line with a whole college, collaborative approach to inclusion, underpinned by universal design.

3.2. Provide funding for the securing of medical screening and reports required to verify disability for DARE and disability support service registration. New AHEAD research shows that a minimum of 4.8% of higher education new entrants have a disability but do not disclose and register for support. There are likely myriad reasons why students do not disclose including lack of awareness of services, issues of identity, stigma and a desire for independence, but undoubtedly, a significant one is the requirement for expensive medical screening and reporting required to verify disability in order to avail of the DARE scheme or higher education supports.

Given that people with disabilities in Europe are twice as likely to live in poverty (European Disability Forum's Human Rights Report, 2020), there is a need to provide targeted funding streams for students to cover the cost of medical screening/reports in order to remove barriers to entry and support. Additionally, institutions should seek to create a positive environment for disclosure of disability in which students feel safe to disclose and avail of relevant supports.

3.3 Whole of government, inter-departmental collaboration on the provision of state funding/supports to provide coherence and simplicity in delivery of state supports and reduce barriers to access. Commitment to coordinating with other government departments (such as social welfare and health) to ensure barrier free access to state supports on and off campus for people with disabilities, for example the provision of personal assistance for which responsibility is currently split between the HSE (off campus) and the institution (via the FSD) which is often problematic.

Other barriers identified of this nature include the removal of vital supports such as the medical card or travel pass for people with disabilities upon receipt of a PHD stipend which highlights a clear misunderstanding of the impact of disability and the reduced opportunity for students with disabilities to engage with incidental employment in order to supplement college costs.

Students often report on the difficulty of application processes for supports and funding and the frustration and exhaustion of having so many different streams of funding and applications to engage with. A streamlined, clear and coherent application process for various state supports with a single point of application should be developed. This requires strong collaboration with other key departments such as Social Protection and Health and a recognition of the added cost of living with a disability which Cullinan and Lyons (2015) estimated to be an average of €207 per week.

“When I got SUSI, my medical card was taken off me and instead, I was given a GP visit card and this meant I had to pay for hospital visits and medication – I was told when I finish college, I’ll get my medical card” – Students with Disabilities Advisory Group member, AHEAD SUSI Submission.

3.4 Recognition within SUSI of the proven added cost of living and learning with a disability, provision of the student grant for part-time learners and increased flexibility in grant provision for modular study. Currently, the eligibility and payment rates of the Student Grant represent very significant barriers to engaging in higher education. AHEAD have already made a detailed submission to the review of SUSI, but key elements for consideration in the context of the NAP are:

- Opening eligibility to part-time learning and longer, modular study, which offers a very suitable pathway for many students with disabilities to manage the impact of their disability and continue learning. However, while 7.7% of the full-time higher education population are registered with Disability Support Services, only 1.3% of the part-time population are registered (AHEAD, 2020), with many reporting financial barriers to participating in part-time study.
- Recognising the added cost of learning with a disability. Currently, in determining the eligibility of individuals and the level of grant awarded, SUSI examines household income, but does not consider the impact of disability and the proven additional outgoing expenditure of living with a disability. Cullinan and Lyons (2015) estimated the added cost of living with a disability to be an average of €207 per week (with a higher range estimate of €276), totalling an average of more than €10,000 a year. For students, these additional costs incurred may include medical and social care service costs, the higher cost of low availability accessible housing, off-campus professional counselling services, specialised diets and increased transport costs. It is imperative that the state recognise these added costs, as well as the decreased opportunities for supplemental employment, and provide additional support to achieve equity of access.

- Ensure learners who have disengaged in learning through Covid, or received medical deferrals, have barrier free re-engagement with SUSI. Currently, a student wishing to repeat on medical grounds must engage with a lengthy and arduous appeals process to secure an extension of their SUSI grant – often at a time when they may be very unwell. In reality, many drop out rather than complete the process. This could be avoided by developing a straight forward procedure whereby SUSI gives institutions/ETBs the authority to confirm that a repeat on medical grounds has been granted, automatically triggering eligibility for an extension of the SUSI grant.

3.5 Develop a national approach to quality assurance of HEI supports to ensure that supports recommended by services are student-centred and applied with quality and consistency by academic staff and other key actors in the process.

Members of the AHEAD/USI Students with Disabilities Advisory Group consistently report positive experiences of their direct engagement with support services, but frustration, difficulty and inconsistency in receiving recommended supports in the classroom which in many cases is largely dependent on the attitude of the professional concerned.

Frustration ranges from a lack of implementation of the recommended support by academic staff, to inconsistent quality in delivery of supports from third party providers such as personal assistants.

This is supported by results from the Learning from Home Survey in which more than 1 in 5 disagree that their recommended exam/assessment supports have been applied by their lecturers/teachers (AHEAD, 2021 – to be published).

If the needs assessment and associated recommendations are to continue to be a right based instrument for students with disabilities to engage in higher education, the system must be underpinned by robust quality assurance practices which ensure quality and consistency of application and explore whether supports are student-centric. The system currently provides a significant level of quality assurance and oversight for teaching and learning, but very little for support provision.

“There have been no allowances for extra time in most of the assessments and many (admittedly not all) of our lecturers ignored any grievances brought to them, or even gotten defensive and refused to hear it” – student, Learning from Home Survey 2021

3.6 Increased focus and national approach to guidance and transition planning for students with disabilities in to and out of higher education to ensure continuity of supports on entry, recognition of the importance of trained and impartial guidance, and adequate preparation for employment on exit.

Continuity of supports is particularly crucial for retention in the first year of higher education for students with disabilities (Reilly 2019). Successful transition and full engagement have been found to be critical to student success and greater retention, (Thomas 2012). Ashton, Banks and Shelvin (2021) also elucidate that guidance and transition planning for students with disabilities is inadequate when compared to general guidance provision in schools.

AHEAD recommends the provision of a centralised national one-stop-shop for provision of out-of-school guidance which is disability-aware, information on access routes and funding

streams available, and support with transition planning in to and out of higher education. This could be achieved by widening the scope and remit of existing Adult Guidance Services.

3.7 The addition of students with intellectual disabilities as a NAP target sub-group. In recent years, there are increasing numbers of higher education providers now offering options for students with intellectual disabilities in a HE setting with positive results. This has led to the establishment of the Inclusive National Higher Education Forum, a forum for consultation between providers, with a view to driving strategic developments, informing policy and building capacity in the higher education sector to deliver meaningful education programmes and outcomes for people with intellectual disabilities in Ireland. There is a willingness and a desire by

many HE providers to expand provision for students with intellectual disabilities, but a lack of access to appropriate levels of state funding is cited as a major barrier.

AHEAD recommends including students with intellectual disabilities as a target sub-group in the NAP, ensuring specialised programmes such as those outlined above are eligible for state funding through the RGAM, and providing access to the Fund for Students with Disabilities for providers in FET/HE to support students with intellectual disabilities, ensuring the fund is bolstered sufficiently to cater for the additional required support for this cohort.

Disability Support Staff should also be upskilled and accommodated to support this cohort.

3.8 A whole of education approach to access for consistently under-represented students with sensory disabilities (blind/deaf). AHEAD's research on participation has consistently highlighted the low participation rate of students with sensory (visual/auditory) disabilities in higher education. The number of students in the Blind/Visually Impaired category registered with HE support services in 2018/19 was 273 and the number in the category of Deaf/Hard of Hearing was 396. In the last ten years, the numbers of students with sensory disabilities has grown at less than half the rate of students with disabilities more generally. While the number of students with disabilities has grown by 223% in that period, numbers in the Blind/ Visually Impaired category have grown 104% and numbers in the Deaf/Hard of Hearing category, just 92% (AHEAD, 2020).

AHEAD has repeatedly called for cross sector collaboration on this issue.

Our understanding from engaging with students and stakeholders is that many of the educational barriers these students experience occur at primary and secondary levels, and so AHEAD recommends that the Department form a cross sector, whole-of-education working group featuring stakeholders in the education system and relevant NGOs to collectively identify the key issues and make recommendations to improve educational experiences at all levels and increase higher education access.

## Conclusion

The objective of the current NAP is to engender an all-inclusive student body which reflects society's diversity. As a nation, diversity must be welcomed and absorbed into education to advance a cycle of inclusion, normalisation and acceptance. Accessibility to, and greater participation in all aspects of education are essential for this to materialise.

Implementing the recommendations in this submission will support the development of a higher education system infused with more flexibility, accessibility, student voice and choice –



where inclusion is everyone's business. This will support the sector to realise the human right of all individuals to a quality educational experience, where barriers to learning are located predominantly in systems, environments and curricula, and addressed through proactive inclusive design, rather than locating them within our students.

Implementing the recommendations will also support the state to work towards the UN Sustainable Development Goals and its implementation of the UN Convention on the Rights of People with Disabilities, as well as supporting institutions to meet legislative responsibilities concerning equality and accessibility.