

Submission 4.27 [HECA](#)

About HECA

The Higher Education Colleges Association (HECA) is the representative body for private higher education institutions in Ireland, which is comprised of thirteen established, mature and privately funded higher education institutions (HEIs)¹, providing quality assured, flexible, cost effective and focused programmes at higher education levels (between Levels 6-9 on the National framework of Qualifications) which are both accredited and awarded by Quality & Qualifications Ireland (QQI). In the last academic year, HECA member HEIs had 27,000 enrolled students representing approximately 12% of the total higher education student population in Ireland. HECA member institutions have a positive track record of significantly contributing to capacity building, social inclusion and increasing access to higher education (HE).

Introduction to the Submission

The Higher Education Colleges Association (HECA) welcomes this opportunity to contribute to the development of the next National Plan for Equity of Access to Higher Education. In this submission we focus our response on the key questions of the National Access Plan 2022-2026 Consultation paper and provide a brief context of the value of equity of access to higher education for individuals from a disadvantaged background or with a disability. While recent decades have seen policy success on increasing the numbers of young people and adults attending and successfully completing higher education, it is still notable that socio-economic characteristics, rather than merit, track learners through to higher education and into the labour market. Enabling broad access to education is undeniably the key to reducing inequalities in society and promoting equality of outcome for our young people and adults. Despite costs associated with participation in higher education (HE), people with a Further Education (FE) / HE qualification do better in the labour market and in life-chances over the longer term.

1 HECA Colleges: CCT College Dublin, Dorset College, Dublin Business School, Galway Business School, Griffith College, Hibernia College, IICP

Education and Training, Irish College of Humanities & Applied Sciences, SQT Training Ltd., National College of Ireland, Open Training

College, Setanta College, St. Nicholas Montessori College Ireland.

The DFHERIS/HEA policy of increasing diversity, equality, inclusion remains a persistent challenge; as demonstrated by the reduced number of socio-economic cohorts in higher education, (HEA Maps and Socio-Economic)

. However, the overall vision for equity of

access to HE in Ireland is positively supported by the DFHERIS Statement of Strategy 2021-20233 which puts a spotlight on inclusion and supporting learning for all. Indeed, a growing global vision is that no-one should be left behind.

Responses to the Questions:

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

The overall vision for equity of access to higher education must ensure that all have a fair, just, equal and meaningful opportunity to gain access to HE.

Equity of access and participation in HE requires dismantling obstacles that prevent some young people and adults from participating on a par with others. One obstacle could be dismantled by the provision of equal access to State student supports so that students attending QQI validated programmes at private HEIs have access to these supports. In turn, this will broaden access to higher education to those receiving these grants who are, by definition, from lower socio-economic backgrounds, students with disabilities (SWD) or from marginalised or vulnerable groups.

This obstacle is also contrary to the Oireachtas Joint Committee of Education recommendations in 2017 which recommended the inclusion of State supports for eligible students at private HEIs. If the Joint Committee recommendations are enabled, this would provide a fairer and more inclusive public policy. In fact, Ireland is out of step with many EU member countries who make no distinction between public and private HEIs when it comes to State recognition, support and equity of access to HE.

Another obstacle is associated with parity of access for young people from disadvantaged backgrounds. There are many talented school-leavers who have academic potential but because of poor educational provision are not able to obtain the higher points usually in place for public HEIs undergraduate programmes. For example, if a student from a

disadvantaged background does not have sufficient CAO points in comparison to their more affluent peers, they may not be able to attend an undergraduate programme of their choice in the public HEIs. However, they may be eligible for a similar undergraduate programme in a private HEI but are denied uptake of the programme due to no State financial aid for students in private HEIs.

<https://hea.ie/statistics/data-for-download-and-visualisations/socio-economic-data-and-maps/>

<https://www.gov.ie/en/organisation-information/3f066-statement-of-strategy-2021-2023/>

So, on the one end, the academically capable student from a disadvantaged background is denied access to HE because of poor educational provision in comparison to their peers, and on the other end, financial aid is denied for the undergraduate programme that they have gained access to, which ironically, some of their peers from a more affluent background may be able to afford. Some disadvantaged students and their families/carers feel they have no option and make significant sacrifices to attend their programme of choice in the private HE sector. To have to do this without any State supports is extremely challenging for these students. Funding to support equity of access should be student-centred rather than institution-centred.

An increased use of relative performance ranking - where the 'value-added' by DEIS schools could be taken into account, for instance - would improve the opportunities available to applicants from some less affluent backgrounds.

Another encounter of student discrimination and national limits to equity of access in higher education is at the CAO application stage where nine HEIs in the CAO system are listed as not eligible for SUSI funding. This is straight away limiting the choice for students who require student supports. Private HEIs provide opportunities to students who find the public system closed to them because of capacity, CAO points, geographic constraints or because they find that it is the only institution offering the type of programme they desire. Equity means treating CAO applicants equally if they choose to attend public or private HEIs by providing them with equal access to SUSI grants and other supports, as recommended by the Oireachtas Joint Committee in 2017⁴

.

Other considerations are as follow:

- Consider CAO points issues for high demand/low supply programmes such as medicine. Should a quota of places for different categories of under-represented groups be applied and apply a lottery as long as students have minimum requirements?
- Target a Universal Design for Learning (UDL) approach to access across all FET/HEI programmes. The application of UDL principles can meet the needs of potential learners with a wide variety of characteristics and puts a high value on both diversity and inclusiveness.
- Consider career guidance structures and review applications processes that put emphasis on self-declaring accommodations. Self-declaration at the point of application is often perceived by the candidate as impacting negatively on the application. Consider the perceptions and effects of self-declaring accommodations. While HEIs should be aware of self-declaring accommodations, it can be a disincentive at an early stage of the access process with some applicants perceiving it as prejudice.

4 Oireachtas Wake Up SUSI Report 2017

- Simple Indicators should be used as benchmarks of national performance in improving equity of access with set targets for the increase (%) in participation of currently under-represented groups (socio-economic, disability, gender, mature, ethnic).

2. a. Who are the target groups that should be specified

in the next National Access Plan?

- If true equity of access is to be achieved, learning is for all, and nobody must be left behind.
- A strong spotlight should be on increasing target groups who are currently and consistently under-represented in higher education. The groups include students in DEIS (Delivering Equality of Opportunity in Schools) schools; urban and regional areas with low representations (e.g., certain postal codes in Dublin); young people in care, prisoners, ethnic groups, refugees etc.
- While the numbers of mature learners and students with disabilities in HE is

increasing, there is still room for further improvement. Notably, individuals with intellectual disabilities are significantly under-represented and this group should be a high priority. Also, target financial support and structures for mature students from low economic backgrounds and the travelling community to access short courses within their local communities and promote a return to education. FET/HEIs could be funded to provide localised training courses designed specifically for the community involved.

- While some progress has been made by the DEIS scheme in relation to the students progressing into higher education, more needs to be done, particularly in relation to progression from further education to higher education, the development of earn and learn opportunities and the widespread dissemination of apprenticeships. DEIS post-primary schools are under-resourced by comparison with others in the free education scheme.

- Students of the private HEIs from disadvantaged backgrounds who feel they are discriminated against when it comes to exercising their right to attend a QQI approved accredited course of their choice.

b. How do we ensure that vulnerable members of our society are included (e.g., students currently in care or who have experience of being in care)?

- Beginning after TY, target and support vulnerable students with respect to their potential career choices. Focus and remove barriers to access and target specific skills development to meet their career preferences.

- Expand the DARE/HEAR provision and target FET/HEIs to make specific provision (%) for access to all degree programmes at undergraduate level for vulnerable members of society.

- Closer coordination of support programmes targeted at hard-to-reach groups, especially disadvantaged young people.

- Greater emphasis in such programmes on career counselling and provision of information about courses available in further and higher education as well as details about pre-entry supports including access schemes, student mentoring and homework clubs.

- To get an understanding of the magnitude of potentially vulnerable students in care, Tulsa works with over 6,000 children in State care. It's important to initiate frequent coordinated liaison between the National Access Office and the Tulsa Education Support Service (TESS) which can identify emerging educational trends and needs among vulnerable young people.

3. How can pre-entry and post-entry activities be developed?

- Identify and target issues and stages that are creating hurdles for the transition of students with different disabilities/disadvantages into higher education.
- Promote FE/HE institutions to develop mandatory staff upskilling in UDL to support the development of pre-entry and post-entry activities.
- Targets for students with all categories of disability/disadvantages could be embedded within performance indicators for participation, equal access and lifelong learning.
- With specific regard to pre-entry development:
 - o Schools urgently need to provide teaching about inclusive education and increase opportunities for contact between students who do and do not receive support (e.g., cooperative learning).
 - o Provide pastoral and confidence building care with aims to normalise the expectation of progressing to FE/HE and reduce the potential of peer bullying for students who indicate they want progress beyond second level.
 - o Have policies that support pupil's social/emotional needs and maintain a culture of self-belief alongside teaching and learning.
 - o Provide additional school-based student learning and mentoring supports.
 - o Collaborate with FE/HE providers' learning support units and develop a FE/HE mentoring system for secondary school students. These supports could focus on students who have:
 - additional learning requirements,
 - require bridging or ongoing support in relation to specific subjects that they may find challenging,
 - providing guidance on how to navigate the progression pathway

to HE.

- Identify and support widening the participation field initiatives in primary and secondary schools as well as communities. Provide outreach days for schools and communities e.g., target specific undergraduate courses and run outreach programmes in schools as a means of supporting stepped access onto preundergraduate and undergraduate degree programmes.
- Utilise a person-centred approach to ensure that TLA is meeting the needs of each young person, recognising that each has a unique style of learning, communicating, building relationships and making decisions. Establish a system wide change theory approach to post-entry support. Develop personal pathways with flexible accumulation of credits.
- Focus on work-force development plans that create practical, paid, work-based learning experiences building credits in professional upskilling and re-skilling.
- Post-entry support from FE/HE institutions in monitoring and supporting the students' engagement and progress throughout their programme. The support roles would be undertaken variously by the FE/HE academic success coaches, learner engagement officers, learner support units and counsellors, working directly with the programme delivery team of lecturers, tutors, programme leaders and administrators.

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

- Extend SUSI grants to:
 - o private HEIs who offer QQI validated undergraduate programmes,
 - o part-time,
 - o blended programmes.
- Disability funding needs to be in place for students with disabilities to study in HE on a part-time basis. This should also be available to students with disabilities studying in the private HE sector.
- Audit and review the effectiveness of current programmes in affecting change over a set period and amend/target accordingly.

- Extend the financial supports for the DARE and HEAR programmes to students attending private HEIs.
- National and/or global schemes that identify best practice and improve targets in particular areas or groups should be emphasised and put into practice by key access staff. Resources should also be streamlined to avoid duplication of work by different agencies, access programmes providers, youth groups, bodies etc.
- Timely funding and implementation of best practice or new initiatives and pilot schemes can also better utilise and progress the objectives of the National Access Plan.

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

- Encourage, resource and foster collaboration for mainstreaming inclusion, diversity and lifelong learning.
- Reduce disadvantage from economic, social, cultural, physical, emotional experiences by attending to quality effective education supports and pastoral care.
- Promote, resource and build capacity within the HE sector in Universal Design for Learning (UDL) and innovative programme development to meet career preferences of vulnerable and marginalised members of society.
- Resource the learning support units of HEIs so that students with particular learning needs can undertake their programme on an equal (or equivalent) basis as others.
- Consider the amount of additional time and support that students with disabilities may require when developing programmes and learning supports, e.g. the additional time and support that students with intellectual disabilities often require in order to keep up with coursework and study can be significant for both the student and the support staff (this should also be considered with respect to funding).
- Create a digital level playing field and provide resources for suitable technology and devices for students experiencing financial challenges.
- HEIs can further embed the goal of mainstreaming by providing role models of inclusivity and diversity within their workforce.

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

- Create, plan and apply a whole-of education and whole of government strategy for widening participation of vulnerable and marginalised persons in education.
- Addressing the pinch points throughout the education stages i.e.
 - o Tackle attendance and behavior in primary/secondary school.
 - o Smaller class sizes - schools with larger year groups overall are associated with lower performance among disadvantaged students.
 - o A focus on teaching and learning, especially paired or small group additional teaching; improving feedback between teachers and pupils and one-to-one tuition can help the retainment of disadvantaged pupils and help improve pupil ambitions.
 - o Secondary schools could consider using metacognitive/independent learning and peer learning strategies as well as additional support during curriculum time.
 - o Age and culturally appropriate messages, including targeted social media campaigns, should emphasise the value of staying in education until a young person has acquired a qualification from TES.
 - o Development of alternatives to the Leaving Certificate as an access pathway to higher education or revisit whether the Leaving Certificate is currently fit for purpose with respect to equity of access and inclusiveness.
 - o Build partnerships with schools to target neighbourhoods with low HEI participation rates.
- Accelerate moves to a unified tertiary education system. Clearer pathways are needed to access public and private HEIs for those not going the traditional route directly into HEIs from the Leaving Certificate.

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

- Career guidance and mentoring for career satisfaction and connectivity.
- Evaluate and rebalance the relative weightings given to the Leaving Certificate and FE awards at NFQ levels 5 and 6 to immediately improve FE to HE progression.

10

- Promote formal articulation agreements between FE and HE providers including

clear access, transfer and progression routes for students on all ETB/FE programmes on to their local public and private HEIs.

- Offer a continuation of SUSI/Disability funding for FE students to enable them to progress to linked programmes in private HEIs.
- Empower FE students to familiarise themselves with a linked HEP as part of their FE programme and deliver a specific orientation to support progression to HE.
- FE and HE staff collaboration/networking and sharing of discipline and TLA expertise, professional development, academic quality enhancement etc.

8. How can other social inclusion initiatives outside of the higher education sector be harnessed to support equity of access objectives?

- Social inclusion initiatives are not current and need a more nuanced focus on education. The housing crisis, unemployment, reduced access to healthcare and the digital divide all have a direct impact on under-representation in HE.
- Target youth employers and educators (community volunteers/supervisors/trainers of extra-curriculum activities/sports etc.) who are involved with teaching young people, of the equity of access objectives, and how it can benefit young people that they instruct.
- A dedicated social media and mainstream media campaign should be utilised to promote the equity of access objectives. The campaign needs to be targeted at young disadvantaged people and provide a 'real' life connection and stories of the personal benefits of progressing to FE/HE. The campaign should also be actively supported by role models, businesses, etc.
- To support the campaign, an information pack targeted at disadvantaged young people should be issued by the National Access Office and provided to relevant State agencies and youth organisations, sporting bodies etc. The pack would list the financial supports for disadvantaged young people as well as several educational and training options including apprenticeships, earn and learn opportunities, traineeships, FE and HE qualifications. The information pack should be utilised across social media platforms such as TikTok, Snapchat, Instagram etc. as well as the traditional paper and websites.

- Use of social inclusion to attract the people who left education early and support them in progressing their education.

11

- As stated previously, have HE outreach to hard-to-reach communities and familiarise individuals with the FE/HE environment, e.g. non-academic use of HE facilities in areas such as sport, drama etc.

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

- The digital divide was intensified, lack of appropriate devices/software, poor connectivity, inadequate study environment. A fairer allocation of State digital supports targeted at students who were financially challenged, or disadvantaged would have narrowed the digital divide further (note the majority of disadvantaged students at private HEIs did not receive resources or digital devices from the COVID19 State funds).
- Isolation, loss of student socialisation and sense of belonging to a community of learners highlighted the importance of on-campus contact with teaching and learning staff and students.
- Unequal access to student supports as students at private HEIs did not receive the COVID-19 supports that their public higher education sector peers did e.g., no devices to support online learning, no funding towards mental health supports or no access to the €250 COVID-19 grant support for students for the move to online learning. This was particularly challenging for students. It should have been targeted specifically at disadvantaged students in public and private HEIs rather than be universally available to all students who had either paid the €3,000 a year fee or were on SUSI grants.

Conclusion

We have highlighted many ways to improve equity of access to higher education in this response and indeed, with other consultations over the last year. We ask the authors of the next National Access Plan to consider a fair, student-centred State funding model which will enhance equity of access for disadvantaged students. The inclusion of students from private

HEIs will result in limited costs to the Exchequer per student whilst also implementing the Oireachtas recommendations.