

Submission 4.18 IAU

The IUA is delighted to respond to the Consultation on the new National Plan for Equity of Access to Higher Education 2022-26 (NAP). Whilst HEIs have been invited to draft individual responses, the IUA is also representing the views of the Access Steering Group for HEIs. HEIs share the HEA's ambition to increase participation in and completion of higher education programmes by access target groups. Below we set out what we see as the key objectives for the new NAP, and the respective responsibilities of the State and of HEIs in delivering these objectives.

Linking and mainstreaming supports

The IUA welcomes the decision of the Minister to review SUSI and the provision of other supports to Higher Education students (for example through SAF, FSD, PATH and DEASP supports). Currently, however, state supports do not adequately link together. Parallel funding streams with their own separate criteria and application processes, whilst providing needed resources to students, represent a de facto barrier to those who need them most, and have led to heavy administrative burdens on both students and HEI access, disability, and student support services, thus directing staffing resources away from the priorities of pre-entry outreach and post-entry support to target students.

The next NAP should prioritise a high-level review on the totality of supports to higher education students. Such a review should consider the mainstreaming of supports in higher education for all learners, regardless of their stage of life, their stage of entry to HE, their mode of study (part-time, full-time, online etc), and for the entire duration of their studies. Such an approach would be strongly supported by Irish HEIs.

The next NAP should aim to achieve a fully inclusive higher education system, with the concepts of Universal Design (UD) and Universal Design for Learning (UDL) as key facilitators of this. UD/UDL and Inclusive Education should be embedded as core operating principles and practices across all relevant national and institutional strategies, to enable and support HE participation by all, with an agreed set of national metrics to monitor progress, covering all aspects of the student lifecycle, including entry, retention, progression, and graduate outcomes.

Review and Define Priority Groups and Targets

The National Access Plan 2015-19 did not target all groups most under-represented in HE. Some were missing entirely, some were included but not adequately defined,¹ and others would now benefit from a re-examination of the rationale for their ongoing inclusion.

The next NAP should therefore revise the categories and definitions of the target groups in consultation with all relevant stakeholders. The next iteration should set out an action plan to overcome the barriers facing participation by each group, set out targets to be achieved and outline the roles of each partner in ensuring these.

IUA would particularly like to draw attention to the following target groups:

Part-time flexible learners and mature learners:

In looking at the data (including that of the NAP Progress Report²), it can be seen that the participation by all access target groups has improved, with the exception of the part-time/flexible and mature student target groups, where no significant change has occurred.

Currently part-time/flexible students (a large majority of whom are mature students) cannot access the same state supports (or indeed some HEI supports) as full-time students. Some of the barriers they face in accessing HE are due to other parts of the public system (incl. DEASP). The inaccessibility of SUSI grants to PT/Flex learners is strongly linked to low participation by disadvantaged students in part-time/flexible HE, and to low HE participation rates by first-time mature learners more generally.

There are systemic issues in the identification of these ‘first-time’ mature students. The lack of a clear and accepted definition across the entire Further and Higher Education and Training system and other State agencies has contributed significantly to these issues. A number of these issues have been raised with the Study of Mature Student Participation in Higher Education (2021)³. An agreed definition is needed which can be used across all relevant public bodies, which aligns with broader Irish and European policies aimed at lifelong learning, upskilling and reskilling.

Similar issues apply regarding “second chance” access students: those who have withdrawn from Higher Education before completion of their undergraduate programmes and are seeking to re-engage with HE. The small investments needed by the State to encourage and support this re-engagement should be balanced against the long-term costs to other branches of the State of low educational attainment.

The evaluations of Springboard+ show clearly how the support provided through that programme regarding fees and DEASP payments have been successful in increasing part-time and flexible education for a broad range of learner cohorts. This successful approach should be replicated for students in all HE courses, not just for a small subset of courses managed under a separate administrative programme run on a 12-month cycle.

The IUA’s 2020 policy position “A Student is a Student is a Student” outlines and proposes a broad systemic approach which would lead to a step change in the provision of and participation in part-time and flexible learning across all cohorts, including mature students and those accessing higher education by Recognition of Prior Learning (see Appendix 3). This approach is strongly supported by the entire Higher Education sector.

Travellers and Roma:

The Action Plan to Promote Traveller Participation in Higher Education⁴ is a much-needed framework to increase Traveller participation and success. This needs to be fully incorporated into the 2022-26 NAP and extended to include Roma, together with the additional dedicated resources and funding required in order to ensure its full scope is achieved.

Additional target cohorts for consideration:

Given changes in Irish demographics and educational attainment over the 30 years, the plan should consider how those students who are “First in Family” can be identified and supported into and through Higher Education. This indicator is widely used in other jurisdictions and may now be of increased relevance in an Irish context.

In addition, recent changes in migration patterns have resulted in a welcome increase in diversity in Irish society, including in primary and post-primary schools. The NAP should

consider how this diversity can also be supported and promoted across the higher education student population, so that higher education institutions and campuses can better reflect the full diversity of today's Irish society (see Appendix 2)

Data

Where revised NAP target groups are established, DFHERIS should work with DES to establish and share baseline data on those cohorts within the Post-Primary school system. This will help HEIs to better target access cohorts and support the HEA/DFHERIS is establishing a more cohesive sectoral approach to outreach/pre-entry work. For example, the HEAR Review experienced difficulty in sourcing data relevant to the targeting access cohorts described in the NAP. Access to this data would have given us clearer insight into how we would target the most disadvantaged students. We would welcome clearer strategic links between relevant Govt Departments in respect of access targets.

The Statistics Section of the HEA has completed and present some excellent data on entry and participation of students in Higher Education. We fully support extending this visibility and accessibility to data to the NAP targets so that HEIs can use this data to help inform its practice.

Inclusive Mobility

As part of ensuring full equity in higher education, those students in the access target groups should have the opportunity to have the same student experience as the mainstream cohort including not taking up international mobility opportunities. Evidence presented through the 2017 EMASI⁵ the recent EPFIME⁶ reports that students who participate in mobility projects experience greater success in Higher Education. The next NAP should to establish a target to explicit targets setting out, under the proposed UDL approach, the recommendation to link to other relevant policies and practices to other parts of the Higher Education system (i.e., Student Grants, HEI International Offices etc)

Appendix 1: A Student is a Student is a Student": a Position Paper on Part-Time/ Flexible Study in Irish Higher Education (Executive Summary, April 2020)

In 2012, the Higher Education Authority (HEA) published the report, "Part-time and flexible higher education in Ireland – Policy, practice and recommendations for the future"⁷. It began: "Now, more than at any point in our recent history, there is a compelling economic and social case for new initiatives to raise levels of education and skills among adults in the wider population in Ireland". The first of the report's recommendations for the future is overarching: by 2016, full equality of provision and support will have been achieved in higher education for all learners, regardless of mode or duration of study.

Since then, some important developments have been made to support part-time/ flexible students. The Student Assistance Fund and Fund for Students with Disabilities have recently been extended to part-time students; as one of the target groups in the National Plan for Equity

of Access to Higher Education (National Access Plan) 2015-2018, part-time/ flexible students are eligible to apply for the recently-established PATH 1916 Bursary Fund; and specific labour market activation programmes have been developed for part-time students. These initiatives are welcome as an acknowledgement that there is a need to be addressed in helping to make part-time/ flexible higher education more accessible to a broader range of potential students. Another welcome development is the Human Capital Initiative⁹ which includes the provision of upskilling and reskilling through lifelong learning as a key area of focus. It will create innovative opportunities, and will need to be considered as it evolves.

In line with the National Higher Education Strategy to 2030¹⁰ and their own strategic plans, HEIs have developed innovative approaches to make part-time/ flexible learning a viable option for students. Many have already achieved considerable impact across a range of niche areas, in a range of local contexts. Where there are operational issues, local patches have been created across the sector in efforts to respond to the needs of this growing student cohort.

However, fundamental issues remain unaddressed at system-level and HEI-level. As such, the HEA's 2012 recommendations have not been achieved, while the economic and social case for part-time/ flexible higher education has become even more compelling in the intervening years. Systemic barriers continue to result in relatively low levels of participation in part-time/ flexible study. While the actual numbers of flexible (i.e. part-time and remote, as recorded by the HEA) enrolments in public Irish HEIs have grown over time, this is in the context of overall student numbers growth. Proportionately, part-time students have remained steadily at just 17% of all enrolments since 2012/13, with remote students increasing from only 1% to 3% in that time¹¹. This falls short of the 22% by 2019 target in the National Access Plan, which was maintained by the Progress Review of the National Access Plan and Priorities to 2021¹², and the 25% by 2021 target in the Higher Education System Performance Framework 2018-2020¹³ from a 20% baseline in 2016/17.

Prevailing issues and challenges associated with part-time/ flexible higher education were examined by the IUA Part-Time/ Flexible Subgroup, made up of cross-sectoral stakeholder representatives. They are set out in brief below and in full in the Position Paper, which was the subject of a consultation process aimed at seeking detailed input and endorsement from a range of perspectives across HEIs in order to represent the position of the sector.

Vision for the Future: Set of Principles

On this basis, the following set of principles are proposed to inform a more coherent, systematic and viable approach to the development of part-time/ flexible higher education, engendering greater efficiency and effectiveness on the basis that it is adequately resourced. This approach would move away from the 'othering' of part-time/ flexible students towards a system of Universal Design for Learning, guided by the fundamental idea that 'a student is a student is a student' and in line with the HEA's 2012 recommendations. A whole-of-institution approach to mainstreaming inclusion is called for, one that recognises and values diversity, ensuring that student services and supports, teaching and learning environments, campus infrastructure, systems and processes are designed around the needs of all students, and not on any assumption of a 'traditional' student population¹⁴.

Principle 1: The state will equitably fund all students by volumes of accredited learning, expressed in terms of ECTS, at state-funded HEIs in the provision of student fees, grants, capitation and other financial supports¹⁵.

Principle 2: The state will equitably fund public HEIs for students who are undertaking volumes of accredited learning, expressed in terms of ECTS, and underpinned by existing conventions and quality assurance mechanisms, irrespective of the mode or duration of study.

Principle 3: State-funded HEIs will recognise all students equitably in relation to delivery of academic programmes, services and supports, irrespective of the mode or duration of study.

Rather than taking an outdated approach in amending how part-time education fits (or doesn't) with full-time provision, developing a system based on these principles would allow for the re-imagining of how mainstream higher education provision can be delivered in a more flexible manner. This is necessary in order to meet national and European ambitions. Targets for part-time/ flexible higher education are augmented from a labour market perspective by national and European emphases on the need to boost lifelong learning. In 2018, Ireland's lifelong learning rate was 12.5%, above the EU average of 11.1%¹⁶ but falling short of EU's ET 2020 Framework benchmark of at least 15% by 2020¹⁷. The provisional results for 2019 show Ireland's lifelong learning rate as having dropped to 12.2%, ahead of national targets for 2020 but not on course to meet the target of 15% by 2025 in the National Skills Strategy 2025¹⁸ and the Higher Education System Performance Framework 2018-2020. This target is increased to 18% by 2025 in Future Jobs Ireland 2019¹⁹.

The Irish higher education sector is ready to work with government to reduce the disparity between policy and practice, and support our competitiveness in this area of growing demand as driven by changing demographics, a reshaped economy, labour market skill needs and the evolving workplace. HEIs also want to enable lifelong learning for its broader value and wider benefits, helping society to develop a love of learning – lifelong and lifewide. In order for the principles to become reality, Prevailing issues and challenges need to be addressed at system-level and HEI-level.

Definitions and data

Extensive discussion among the Subgroup and during the consultation process revealed multiple references to and understandings of the part-time/ flexible cohorts across the sector, on the basis of a wide range of variables. This is also reflected in national policy documents, across which no single, common definition can be found and different terms are used interchangeably. In the absence of a clear systematic approach, the current student experience is often not reflected where, in reality, the distinction between different modes is blurred. As it was described during the consultation process, the “myth of the full-time student” hides the fact that many full-time students are also working or have other responsibilities. Some students are registered as part-time but taking a full-time load of 60 ECTS at undergraduate or 90 ECTS at Master's level in any one academic year. Part-time students can be found on programmes with a wide range of duration, while some students registered as full-time are on a reduced number of contact hours. The COVID-19 crisis has meant that all students are now experiencing blended or remote higher education.

It also emerged that there is significant variation in the data collection practices and systems regarding part-time/ flexible students and therefore, presumably, in returns to the HEA. As such,

the lack of clarity and consistency in definitions used across the sector has implications for national datasets and the allocation of funding to HEIs for these cohorts of students.

While datasets such as those obtained through the Equal Access Survey have long been available for full-time students, the HEA has only recently begun collecting similar data on the characteristics of part-time/ flexible students. This development is welcome as a lack of a robust evidence base on the student profile has presented difficulties in identifying what services and supports are required by part-time/ flexible students in order to ensure their access, progression and retention in higher education, despite the best efforts of HEI staff.

Funding practices

Despite this, the state funding model for higher education has remained largely in keeping with 'traditional' profiles of students and picture of higher education, defined rigidly by mode in such a way that effectively discourages engagement in part-time/ flexible study. Potential students are locked out of the system, often those who could benefit from part-time/ flexible provision most, as they are unable to get past the first and highest barrier of fees. As it was described during the consultation process, "the cost of participation in higher education for part-time/ flexible students is actually greater than for full-time students". Only those on full-time programmes are eligible for the Free Fees Scheme, the SUSI student grant and the Back to Education Allowance (BTEA) scheme, irrespective of the number of ECTS being taken. From the student perspective, any changes to the funding criteria for part-time/ flexible provision have been restricted to discrete funding streams, such as the developments welcomed above, while core funding arrangements have remained dissuasive.

From the HEI perspective, part-time students are included in the core state funding allocation model on a pro-rata basis, based on the number of ECTS being taken. With effect from the 2020 grant allocation, this should also be the case for remote students in the Universities/ Colleges as well as the Institutes of Technology²⁰.

The same criteria are applied by the state (DES and DEASP schemes) to postgraduate students as to undergraduate students, although a limited amount of PATH funding is currently destined for participants in the Postgraduate Masters in Education. However, different funding structures from both the student and HEI perspectives mean that part-time/ flexible provision is more widely available at postgraduate level. This translates into higher proportions of part-time students at postgraduate (40%) than at undergraduate level (13%) in public HEIs²¹. Since 2010/11, the proportion of part-time postgraduate students has grown twice as fast as the proportion of part-time undergraduate students (8% compared to 4%)²². The greater autonomy of HEIs to manage financial arrangements at postgraduate level shows that demand for part-time/ flexible learning can be stimulated if conditions allow.

This reinforces similar evidence provided through the success of the Springboard+ programme. An effective and attractive model from the part-time student perspective, there is potential to mainstream some of its student-friendly conditions across all higher education programmes. The Springboard+ portal and the CAO's Advanced Entry system (for applicants transferring from further education to higher education, years 2, 3, 4) offer flexible, user-friendly systems for applicants and HEIs. The Springboard+ portal offers information on the availability of programmes, entry criteria, how to apply and how students are funded. If part-time/ flexible learning is to be mainstreamed, the successful features of such a single-entry point could valuably be integrated into the portals already used by students. As well as the advantages such

an approach would provide for potential part-time/ flexible students, where they currently face barriers in accessing information and having to make multiple and onerous applications, it would also help reduce existing duplication of efforts across the higher education sector.

However, beyond it as a technical model, there are significant challenges associated with Springboard+ from the HEI perspective. A labour market-driven programme, a limited number of student places are available across a limited range of programmes with a specific focus. HEIs must compete for these on an annual basis, creating unsustainability and uncertainty for HEIs and applicants, year-on-year. Its discrete funding and conditions and parallel systems create additional administration burden for all actors involved.

Student supports

A pro-rata basis core in the state funding allocation model is despite it not being feasible for HEIs to offer student services and supports on a pro-rata basis. Many services have fixed overhead costs that remain the same for each student, irrespective of mode or ECTS being taken. The availability of services and supports, critical to the student experience, is subject to resources. Most have been significantly affected by the reduction in state funding in the past decade and are already significantly stretched to cater for current demand. The demands placed on the higher education system have grown incrementally, where it was originally designed to accommodate a much smaller and less diverse 'traditional' cohort of students. While HEI core academic services, student supports and commercial services such as catering are available to all students, many of them are typically open during 'normal working hours' as a result of the challenges associated with the provision of teaching, services and support staff outside of this. As such, they tend to not be uniformly and adequately accessible by part-time/ flexible students, disadvantaging these cohorts. As it was explained during the consultation process: "Often, part-time/ flexible students are on campus at different times than the full-time cohort. In many cases, that means that basic services, like catering facilities, and even building heating and campus security are not available as they would be to the full-time cohort."

The creation of viable, mainstream part-time/ flexible study policies and practices, including a more flexible funding model, would open up opportunities for a broad range of students who could benefit from more responsive higher education provision. In doing so, it also presents an opportunity to scale up Recognition of Prior Learning (RPL) practice across the sector. Many of these 'new' and potential cohorts are pinpointed as priority groups in national policy documents and are more likely to need the opportunities afforded by part-time/ flexible learning. Some students in these cohorts commit to full-time provision for reasons of affordability, where they would be better served by part-time/ flexible. They include, but are not limited to:

Lifelong learning opportunities for all;

Upskilling/ reskilling opportunities for those in or seeking employment;

National Access Plan priority groups, including students with disabilities;

Subgroups of the National Access Plan priority groups identified as experiencing difficulties participating in higher education and requiring support, for example:

lone parents;

teen parents;

some people from ethnic minorities;

Carers/ those with caring responsibilities;

Those in precarious and/ or seasonal work.

As we emerge from the COVID-19 crisis, the knowledge intensive part of economy will be crucial in accelerating the recovery. The higher education sector is a key player in this regard and calls for a more coherent, systematic and viable approach, on the basis of the three principles and guided by the fundamental idea that 'a student is a student is a student', to develop part-time/ flexible provision. This will support the access by, and retention of, a broader range of potential lifelong learners for the benefit of Ireland's economy and society.

Appendix 2: Migrant Communities in Ireland

Net inward migration among non-Irish nationals to Ireland has continued to grow for two decades²³. In many western higher education systems (UK, Australia, France, USA), national and/or higher education access strategies have identified underrepresentation in higher education by ethnicity. It would be beneficial, through the next NAP, for the state to begin to address the potential barriers to participation, if any, that this might present in the future.

The UK have been taking this approach since 2011 through their own national strategy²⁴. Currently this strategy delineates participation in higher education by some of its largest ethnic populations (ie Asian, Black, Chinese, Mixed, White, Other). One such method of identification is through the provision of free school meals²⁵ by ethnic group (children entitled to free school meals are only about half as likely to get five or more GCSEs, including English and Mathematics at A*-C, as other children.)

Whilst Ireland does not have a national free school meals programme, the next NAP should set how an action to begin the process of identifying participation rates of Ireland's largest ethnic groups using existing data sources and subsequently setting out how it intends to address any issues identified.

Appendix 3: Recognition of Prior Learning

Introduction

This document has been prepared by the 'National RPL in Higher Education Project' to inform the IUA and THEA submissions to the National Access Plan consultation process. Funded by the HCI Pillar 3 and working on behalf of all 19 publicly-funded HEIs, the goal of the project is to make prior learning assessment and recognition an integral and vibrant part of higher education, one that presents a learning experience of significant and discernible value to the learner, the institution, enterprise and society.

The objective of this document is to encourage the HEA to (i) foreground the role of RPL in supporting HEIs to meet national access and lifelong learning policy objectives and (ii) call for an increase in RPL opportunities for learners and the mainstreaming of RPL policy and practice across the higher education sector in a manner which is coherent and consistent.

RPL as an enabler for access and lifelong learning

Recognition of prior learning (RPL) is a process which seeks to acknowledge all forms of learning regardless of where it has occurred (e.g. in formal educational settings, the workplace or everyday life), and to give it value in the context of a destination award on the National Framework of Qualifications (European Commission, 2008; National Qualifications Authority of Ireland, 2005; OECD, 2004). A fundamental principle of RPL is that a learner should not be asked to relearn something they already know. In the higher education context, this means that applicants who can show that they have achieved sufficient prior learning, may be granted access, advanced entry, credit, module exemptions and in some cases full or minor awards. RPL is sometimes described as a bridging mechanism for learners to access and/ or advance their learning in formal education and upskill/ reskill. It is also a bridge for HEIs, offering them the opportunity to engage in new and innovative ways with individuals and groups of learners from diverse learning and workplace settings.

RPL has considerable and well-documented benefits for learners, HEIs, the economy and society (OECD, 2010). This is reflected in the announcement within the Programme for Government 'Our Shared Future' to "develop and implement a standardised system of accreditation of prior learning", while the 'Future FET, Transforming Learning 2020–2024' strategy from Solas calls for RPL to play a more prominent role in FET, signifying the growing emphasis on RPL in practice, and echoing European Recommendations, evaluations and analyses. For HEIs in particular, RPL can be harnessed as a resource to accelerate progress toward a wide range of strategic objectives in areas including teaching and learning, the student experience, graduate employability, enterprise engagement and regional development.

In the context of the National Access Plan, it is important to emphasise the critical role of RPL in the development of an accessible and flexible higher education system (NFETL, 2015). It is widely acknowledged as an enabler for access and lifelong learning which encourages people of all ages and backgrounds to participate in learning pathways.

RPL has been in use in Irish higher education for decades and despite considerable progress and excellent examples of innovative practice, provision of RPL services is geographically uneven, fragmented and often very difficult to navigate for learners. Many potential learners don't know what RPL is or how it can benefit them. At sectoral level, there is significant disparity and fragmentation in policy and practice within and between HEIs which is impeding the mainstreaming of RPL and the enhancement of services.

The next National Access Plan provides a timely opportunity to affirm the critical role of RPL in contributing to access and lifelong learning and to call upon HEIs (i) to embed RPL as a mainstream, flexible pathway to and through higher education and (ii) to increase RPL opportunities for all learners, and in particular underrepresented learners, who may otherwise be unable to access or progress through higher education. The 'National RPL in Higher Education Project' will help to support the 19 publicly-funded HEIs in achieving these.