

National Plan for Equity of Access to Higher Education

**Submission by the Irish Second-Level
Students' Union**

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1. Key Priorities & Areas for Improvement

1.1 What aspects of equity of access to higher education currently work from a student perspective?

The ISSU believes that **anonymity** is one of the most important strengths of the current system. It prevents direct discrimination and is designed to give students a level playing field. Students appreciate the **transparency** and **simplicity** of the system, and it enjoys high levels of public trust. It is crucial that at least part of the college entry mechanism remains anonymous and externally judged, as students currently feel confident in the system's ability to allocate places **without inherent bias**. The process of application is also relatively **uncomplicated**, which benefits students who may be first in their family to apply, or have not received guidance or assistance in their application process. The universal nature of the CAO allows students to easily apply to a **variety of universities**, and the ISSU appreciates the functionality of this aspect of the system. The ISSU also recognises the importance of and commends the SUSI, HEAR and DARE schemes in aiding students to access university however emphasises there is room for improvement.

1.2 What aspects currently do not work?

The ISSU believes that there are several key areas for improvement in the system: the points system and education inequality, costs, and a lack of emphasis on other pathways.

1.2.1: Points System and Education Inequality:

While the points system is transparent and universal, in reality, it is **not a fair or accurate method** of allocating university places. As points are determined by the supply and demand for the course each year rather than the course itself, it creates a "points race" in which the **primary goal of the entire Senior Cycle becomes the maximisation of points**.

The ISSU is concerned by the **one-dimensional nature of the CAO system**, as it only assesses students on their **academic achievement**. This **unfairly disadvantages** students

with disabilities, students whose parents did not attend college, and in reality, any students who struggle with academics.

Additionally, the ISSU notes with concern that students' success can depend heavily on the **quality of education and access to resources** they receive during the Senior Cycle. It is well known that students in private schools are [much more likely](#) to progress to third level than their public school and DEIS school counterparts. Students in **grind schools** are carefully and expertly prepared to maximise their points, which puts students who can't afford or access this type of support at a disadvantage. Students' chances of progression can be impacted by the availability and **quality of career support and guidance counseling** in their schools. This drives a large gap in accessing third-level based on socio-economic status.

1.2.2: Costs

Another key aspect in need of improvement is the **barrier of cost** in accessing higher education.

ISSU recommends **reform of the SUSI programme** to increase accessibility of the programme and higher education. A central issue is that recipients of SUSI grants are prohibited from having any other form of income, which has been criticised by students and limited many students' opportunities with regard to third-level.

Despite the introduction of 'free third-level fees' in 1996, costs are still prohibitive for many students due to **student contributions** of up to €3000. **Accommodation costs** further contribute to this, with a lack of affordable student housing particularly in Dublin and Cork. These costs can prohibit students from accessing the third-level education they desire, and perpetuates the cycle of inequality which begins at second-level with regard to socio-economic background.

The ISSU recommends **immediate examination of prohibitive costs** and fees for students, particularly with regard to accommodation costs and student contributions.

1.2.3: Lack of emphasis on other pathways

Finally, the ISSU is concerned by the lack of emphasis placed on pathways beyond traditional academic university courses when progressing to third-level.

There is currently a lack of emphasis on other forms of education such as apprenticeships, vocational training, crafts etc. This can prevent students from having the tools or resources to access a broad range of third-level options, as many of these pathways are not integrated into the CAO. Furthermore, this can create a value organisation of third-level, where traditional academic routes are viewed as 'more valuable' than other pathways. Students are not provided with the tools and support to explore a variety of routes into third-level. The ISSU believes that an equitable system of access to higher education must support the diverse skills and interests of the student body and recognise the importance of alternative pathways.

1.3: What is the biggest challenge for students in accessing higher education?

The ISSU identifies four primary challenges for students in accessing higher education: **support and information** for students, **costs and housing**, **unequal access** to education, and **lack of emphasis on other pathways**.

1.3.1: Support and information for students

Disparities in knowledge surrounding third-level progression present challenges for students in accessing higher education. The ISSU is concerned by the **lack of easily accessible information** surrounding features of the system such as grants, HEAR, DARE, and SUSI, studying abroad, matriculation requirements, and alternative pathways. Additionally, the ISSU believes that all students must be able to **avail of career guidance and support** in choosing their course. This support should be particularly focused on disadvantaged students and those who may not be able to access this information at this moment, as well as students who may be the first in their family to attend third-level education in Ireland.

The ISSU recommends that the next National Access Plan includes a focus on the accessibility of information surrounding third level progression.

1.3.2: Costs and Housing:

Another issue that presents a challenge for students in accessing higher education is costs and housing. Housing, particularly in Dublin, can be very expensive and can prevent some students from attending certain universities based. Many students can't afford to move out and are therefore confined to local universities. The ISSU believes that it is crucial that students are able to access affordable accommodation, in order to give them as many opportunities as possible. The ISSU recommends that the National Access Plan **addresses the issue of the availability and affordability of student accommodation.**

1.3.3: Unequal access to education

As stated in the previous section, the ISSU is concerned by the role that Senior Cycle education quality plays in higher level access.

The National Access Plan should examine how to address **socio-economic inequalities** perpetuated by the points race and private education, and seek to bridge these gaps to provide equitable access. The ISSU particularly recommends reform of the points system as part of this work.

Furthermore, the National Access Plan should address **educational inequalities for Irish-speaking students.** There is currently a lack of third-level courses available in Irish for students from the Gaeltacht, or who wish to study through the medium of Irish. As such, this should be addressed and educational opportunities should be provided for students who wish to study through our national language, as is done at both primary and secondary level.

1.3.4: Lack of emphasis on other pathways

As stated, the ISSU is concerned by the lack of emphasis on other pathways, such as vocational training and apprenticeships.

The ISSU recommends that the **CAO form includes other pathways** such as apprenticeships to encourage students to choose the path that is best suited to them. The

ISSU believes that these options should be emphasised in the classroom at a school level and more resources should be provided to teachers.

The ISSU would like to note that the UCAS website in particular displays alternative options such as apprenticeships and internships on their homepage. It is important that we look into options like this as well, in order to encourage mainstream recognition of these pathways.

2.1 Who are the target groups that should be specified in the next National Access Plan?

The ISSU believes that students from **disadvantaged backgrounds** should be specifically targeted in the next National Access Plan. The ISSU is aware of supports currently in place such as SUSI and HEAR, however the union feels that these **programmes could be expanded and reformed** to be more accessible to students. The union also believes that information around these programmes should be made more accessible and visible and that resources should be provided to teachers to support eligible students in their applications.

The ISSU believes the National Access Plan should make specifications for:

- Students from rural areas
- Students of colour who may face [discrimination](#) on the basis of race and ethnicity
- Disabled students
- Female students and gender non-conforming students
 - The ISSU is concerned that female students may not be encouraged by teachers and parents, particularly with subjects with low female participation.
- Students from the Travelling Community
- Students in Direct Provision
- Children of immigrants, particularly regarding clarity around fee status
- Early school leavers and those considering apprenticeships
- Irish speakers and students from Gaeltacht areas
- LCA students
- Students who are the first in their family to go to college

2.2 How do we ensure vulnerable members of our society are included?

The ISSU is **committed to working with all relevant stakeholders** to ensure underrepresented students are included in the next National Access Plan. The ISSU calls for a **range of measures** to be implemented to facilitate the inclusion in the development of the plan and subsequent actions. The ISSU would welcome **increased engagement** with vulnerable students by increased active outreach, the inclusion of **students' views**, inclusion of parents and community organisations in the process of creating the NAP, and implementing further changes

The ISSU acknowledges that not all students are on an equal footing when it comes to entering third level education, notably with regards to **information and financial position**. The ISSU therefore advocates for:

1. Increased **mentoring and support opportunities** at second and third-level
2. Increased direct **contact and connection** between the Higher Education Authority and students, with an increased focus on currently underrepresented students.
3. The abolishment of the student contribution charge for students in Direct Provision.
4. Examine the **full removal** of the student contribution charge, with a particular attention to doing so for lower-income students.
5. Reform of HEAR, DARE and SUSI and to include students in these processes.
6. **University taster programmes** to be made more accessible for students from lower socioeconomic backgrounds, and those in rural areas.
7. **Collaborate with organisations**, such as the ISSU and USI, to provide increased information about accessing third-level to make it into a more accessible and engaging format for all students.

The ISSU warmly welcomes the University College Cork Easter School for Transition Year students from DEIS schools. The ISSU therefore calls for increased **subsidisation of similar programmes**. Expansion of these programmes with measures to increase accessibility of such programmes would be of significant benefit to students.

3. Vision of the Plan

3.1: What should the overall vision for equity of access to higher education in Ireland be for 2022-2026?

The ISSU believes that the **cost of higher education must no longer be a barrier** for students to achieve an equitable higher education system. Students should be able to both afford higher education, and have the opportunity to leave home while doing so. The plan should have a vision of affordable student accommodation so that students are not held back from accessing certain courses or HEIs. Overall, it is crucial that the plan works toward a system where socio-economic status provides students with no advantage regarding the CAO system.

3.1.1: Costs

The vision for equity of access to higher education with regard to costs should be that:

1. Cost is no longer a barrier
2. Students can afford to, and are supported to, leave home to go to university
3. Accommodation is provided at reasonable prices and students are supported to access good-quality accommodation for the duration of their higher education
4. Accommodation costs do not hold students back from certain courses or HEIs
5. Socio-economic status plays no role in accessing higher education or in aiding success in the 'points race'.

3.1.2: Pathways

With regard to pathways, the National Access Plan should work so that:

1. Students can access a multitude of pathways with clear information
2. There is diversity in routes to further education, beyond purely academic university courses
3. The expansion of the CAO system to include alternative pathways
4. Students are provided with more information on alternative pathways in higher education e.g. PLCs, and that second-level institutions teach and recognise other options for higher education beyond university.

3.1.3: Equality in Education

Equality in education should be at the core of the National Access Plan, working so that:

1. Vulnerable students, such as the groups outlined in Section 2, are supported to access a range of pathways and resources. These students must be given adequate support to ensure they have access to a range of higher education pathways.
2. No student is prevented from accessing higher education due to barriers such as parental income etc.
3. The disparities between public and private education are addressed over the coming years to increase fairness in accessing third-level.
4. There is a significant increase in the amount of third-level courses in Irish that takes the demand for Irish-medium education into account

3.1.4: A more holistic approach

The National Access Plan should promote a vision of a more holistic approach to accessing higher education.

Factors other than pure academic performance should be taken into account by the admissions, as addressed in later sections. Currently 50% of students get their first choice and 80% get one of their top three. The ISSU believes the NAP should work to increase these figures so that more students are able to attend the course of their choice. Overall, the NAP should promote a system that moves away from the flaws of the points race system as addressed above.

The ISSU remains concerned by the practice of raffling places to students who have achieved the same points, without consideration of other factors. We believe that in reforms to this mechanism, that decisions should not be made on foot of single material. We would welcome the opportunity to explore alternatives.

3.1.5: Support for students

Support for students in accessing higher education, understanding higher education, and ensuring equal access to quality information should be a key pillar of the vision of the NAP.

It is imperative that students have access to a guidance counsellor who can provide them with information about their options in relation to higher education. Students should be

provided with **accessible information** about their chosen third level course and university life itself. It is especially important that second level students are given comprehensive information and aid when it comes to applying to **programmes** such as SUSI, HEAR and DARE. It is essential that both students and their parents are given the tools and resources to fully understand the CAO system. This is of particular note for children of immigrants, and students who will be the first in their family to attend college.

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

3.2.1: Second-level and Leaving Certificate

The ISSU emphasises the importance of examining equitable access to HE within the context of **Senior Cycle reform**. The ISSU has also noticed a disconnect between the type of learning that takes place at second and third level institutions. Second-level education should prepare students for the world of work and for higher education beyond the final set of exams. The ISSU recommends that **links are formed** between individual third level and second-level institutions to provide students with information and access to resources.

Currently there is an **imbalance between public and private education** especially when it comes to accessing high points courses. The ISSU strongly recommends that this is addressed as part of the NAP. Following from this, there is a strong 'grinds' culture i.e extra tuition amongst second level students, particularly from grinds schools, which can perpetuate cycles of inequality. It must be noted that the current higher education admission system's **reliance on points** alone and rote memorization **amplifies 'grinds culture'**. There also needs to be more oversight of private second level institutes whose sole focus is on obtaining the requisite Leaving Certificate points. Increased academic support and programmes should be provided for DEIS schools and students who are struggling in second level. The ISSU advocates exploring **support programmes for disadvantaged students** e.g mentoring schemes as seen in the UK.

3.2.3: Other pathways

Widening participation in HE must take place in conjunction with opening up a variety of pathways to students beyond the purely academic route of university. Therefore, these other aspects of HE must be integrated into the NAP to increase student participation with HE.

4. COVID-19

4.1: What challenges has COVID-19 presented in relation to an inclusive higher education system?

The ISSU recognizes the difficulties students with **poor internet access** face. The ISSU notes with concern the inequalities and disparities in accessing online learning. This is a common trend in rural areas, with many students at home during the online learning period caused by the COVID-19 pandemic.

The ISSU regrets the **decline in student wellbeing** during the COVID-19 pandemic. The isolation, increased academic work, and lack of social activity in the past year has significantly impacted many students' mental health. This can also cause students to fall behind on their academic, social and extracurricular studies and activities.

Online learning requires a **new style of teaching** to effectively engage students. Loss of motivation is commonly associated with poor online teaching methods..

4.2: How has COVID-19 impacted on students e.g. academic, financial, health, college experience and how can we address these impacts?

The COVID-19 pandemic has wreaked large scale **economic devastation** across Ireland and the wider world. The ISSU recognizes that many students and families may have lost work and income, and may find it **difficult to finance** going to higher education, like having to pay accommodation. The ISSU recommends raising the total reckonable income limit and widening which students qualify for the SUSI grant.

The ISSU notes with concern that second-level students, Transition Year students in particular, have missed out on a lot of **opportunities to explore interests** and look into

different course options. Students have also lost consistent **access to guidance counsellors** and support to help them in exploring third-level.

Many students have suffered **mental health difficulties** during the COVID-19 pandemic. The ISSU notes that many third-level students have still not been on campus. The ISSU calls for incoming first year students to be prioritized to ensure a seamless transition to a new educational environment. Virtual format of third-level currently makes it less appealing as college life is an important motivation for students to progress. The ISSU notes with concern that many students deferred, and the high volume of entries this year subsequently resulting in points increases.

The ISSU notes with concern that there will essentially be two year cohorts that have not yet gotten to experience college life. The ISSU recommends that extra support be put in place for students **transitioning to college life and in-person education**.

5. Pathways and other programmes

5.1: How can pre-entry and post-entry activities be developed?

Many universities in Ireland boast excellent employability rates of graduate students. This is to be applauded, but not without hesitation. The ISSU is concerned by the lack of access to and awareness of FET and retraining opportunities. The Union therefore advocates for more promotion of alternative pathways, both within the CAO and in wider society.

As discussed there are large inequalities in access to HEIs. The ISSU welcomes any opportunity to explore the **expansion and redevelopment of access programmes** to third level. We advocate for these programmes to link **universities with schools**, with a significant focus on DEIS schools, and schools from rural areas. TY taster courses are also welcomed. Subsidisation of these programmes could further increase access to these courses for students from lower socio-economic backgrounds.

The ISSU further advocates for increased mentorship programmes for students entering third-level, such as the UCC Access+ programme to aid students in the transition to HE.

5.2: How can pathways between further education and training and higher education be developed?

The ISSU firmly believes that there needs to be a holistic approach to University and College admissions. We recommend that learning from the *'Trinity Feasibility Study'* be examined within the NAP.

The ISSU highlights the lack of student awareness of FET possibilities, and advocates for FET opportunities to be integrated into the CAO. The [trial](#) of FET integration in the CAO is welcomed, we call for stakeholders to be actively engaged in its implementation and for its expansion soon. Clear information should be provided to students, we applaud the UCAS website for its delivery of information.

6. Solutions

6.1: CAO reform

The ISSU believes that we are at a **turning point in the future of education** in Ireland. This strategic plan must be the **beginning of a conversation on CAO reform**, and the ISSU strongly wishes to **collaborate** in this area with relevant Departments and stakeholders. We hope to open a conversation around areas for consideration and possible solutions with this submission.

Areas to note:

The ISSU advocates that any reforms to the CAO system must ensure that the level of **anonymity** currently in place remains.

The ISSU notes that the current CAO system has no method to **recognise students' abilities** beyond academic achievement, particularly in relation to how their abilities could be implemented or tuned to certain skills/courses.

Students face large amounts of **uncertainty** around how points will change each year, and as such examination of an 'offer system' such as UCAS may be beneficial.

The ISSU commends the CAO in allowing the ability for students to apply to multiple courses and universities across ranges of faculties. We advocate that this remains in future changes.

The ISSU notes that **not all students have the same opportunities** and access to 'grinds' or extracurriculars, and we call for this to be acknowledged in future reforms.

Recommendations:

The Union recommends a **more holistic approach** in granting offers to candidates. The ISSU recommends that **alternative systems** are explored as viable options for entrance to university e.g the Trinity Feasibility study or UCAS.

The integration of **personal statements and extracurricular activities** into the CAO should be examined. Personal statements can increase the ability of HEIs to examine why students are suited to a course, and what they can contribute to the HEI.

The implementation of **interviews** could be open to abuse/corruption and lead to lack of anonymity, however we are open to exploring how this could be effectively tackled.

Furthermore, the **offers system** of UCAS provides increased clarity to students regarding grades required and university progression and should be examined as a potential improvement to the CAO system.

The introduction of **specialised aptitude tests** could be examined, ISSU is open to exploring how these can be implemented without increasing stress and pressure on candidates. Furthermore, the prevalence of grinds schools should be addressed if this is implemented to avoid unfair advantages.

6.2: Accessing higher education

The ISSU is concerned by the complexity of the application process for the Disability Access Route to Education (**DARE**). The ISSU further notes with concern the uncertainty of the effect DARE has on points and the stress this causes on students. The ISSU therefore calls for an immediate review and reform of the application process to this scheme. Therefore, the ISSU wishes to open a conversation with stakeholders on reform of this system.

Students who access Reasonable Accommodations for Certificate Examinations (**RACE**), often will go on to require similar support in exams in HEIs. The ISSU recommends a streamlined process for these supports to be automatically granted in third level institutions. The Union would welcome the opportunity to explore this further.

The ISSU recommends that a **mentoring system** between university students and second-level students should be examined such as those present in the UK, with a particular focus on students in DEIS schools, or are from disadvantaged backgrounds.

The ISSU recognises and stresses the importance of allowing students the opportunity to pursue their third-level education through the medium of Irish, noting with concern the current lack of Irish-medium courses available in institutions across the country. Therefore, the ISSU recommends that there is a significant increase in the availability of Irish-medium courses at third-level and that increased support is given to students from Gaelcholáistí/Gaeltacht regions when transitioning from an Irish to English-medium education.

6.3: Completing higher education

The ISSU welcomes commitments made by Minister Harris to tackle the issues highlighted by the COVID-19 pandemic. The ISSU calls for measures to be implemented to address the **significant mental health struggles** faced by students, in particular those in the Class of 2021/2022, who will be progressing to Further and Higher Education.

Overall Summary and Recommendations

The National Plan for Equity of Access to Higher Education is a key opportunity for improvement of equitable access to higher education, and the ISSU wishes to collaborate with all stakeholders to work constructively towards this.

We wish to emphasise 6 key areas of focus for this plan:

1. Reform of the points system
2. Inequality in education
3. Costs, particularly with regard to student contributions and accommodation
4. Lack of emphasis on pathways beyond academic university courses
5. Support for students in accessing information and resources
6. Vulnerable groups of students, as outlined in Section 2

It is imperative that these areas are addressed in an intersectional and holistic manner to truly achieve equitable access to higher education, with a vision of equity as outlined in Section 3 of this submission. This must particularly address the socio-economic inequalities currently perpetuated by the gap between public and private education, as well as the prevalent 'grinds culture' in Ireland.

The inequities highlighted by the COVID-19 pandemic must be addressed, and steps must be taken going forward to support students who have lost tuition time in the transition to third-level and in-person learning, as well as financial and mental health difficulties.

The key point of note in this submission is the need for reform of the CAO system to be at the forefront of this plan. This extends from integration of other pathways into the CAO, to the reexamination of the points system with the aim of complete reform. We highlight the importance of examining other systems, particularly UCAS, to see what elements could be incorporated into the Irish system to reduce the emphasis on academic performance alone. The ISSU welcomes the opportunity to engage on this going forward to examine how a holistic, equitable reform and/or replacement of the CAO system could be delivered.

Students deserve a system which is equitable, in which cost or background is not a barrier in accessing higher education, and in which we strive to deliver as many opportunities and pathways to students as possible. The ISSU looks forward to working further on this with the Department, and welcomes any queries or further suggestions.