



NATIONAL ACCESS PLAN 2022 – 2028

Consultation submissions

3. Submissions made by agencies

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Submission 3.1 HEA- International Education

Introduction

The National Agency welcomes the opportunity to contribute to the consultation process for the next National Access Plan (2022-2026). The NA is very pleased to note the commitment in the Consultation Paper that “an inclusive higher education system is a national and European priority”.

The new Erasmus+ Programme 2021, which supports student and staff learning/teaching/training mobility abroad, was launched on 25 March 2021. It is the world’s largest such programme and in the period 1987-2020 about 10m individuals – students, learners, lecturers, teachers and trainers from all sectors – were beneficiaries.

Among its key policy priorities is “to promote equal opportunities and access, inclusion, diversity and fairness across all its actions. Organisations and the participants with fewer opportunities themselves are at the heart of these objectives and with these in mind, the programme puts mechanisms and resources at their disposal.”¹

Erasmus+ Implementation Guidelines (29 April 2021) outline the features of a more inclusive Erasmus+ Programme.

The National Agencies are charged with the task of drawing up “inclusion and diversity plans to best address the needs of participants with fewer opportunities and to support the organisations working with these groups in their national context.”²

In defining the potential barriers that stand in the way of equal access to the Erasmus+ Programme, the 2021 Programme Guide lists the following (not exhaustive):

- Disabilities: physical, mental, intellectual or sensory impairments
- Health problems
- Barriers linked

- to education and training systems
- Cultural differences
- Social barriers
- Economic barriers
- Barriers linked to discrimination
- Geographical barriers

National Agency – Contribution to Inclusion

The HEA has been the National Agency (NA) for Erasmus from the Programme's inception in 1987. In more recent years, increasing attention has been paid to broadening participation in the programme. The NA has played an active part in policy formation in this area and has been a strong advocate for changes in the programme. The following are some of the areas where the Agency has contributed.

Erasmus+ Disadvantaged Participants Monthly Top-up

In 2014, the NA with the support of the Erasmus+ National Authority (Department of Education and Skills) introduced the Student Inclusion Supplementary Support Initiative (SISSI) an optional top-up available under the programme. Students in receipt of the Higher Education Grant (SUSI) were eligible for an additional €100 per month. In 2015, 210 students (7% of total outbound numbers) received this top-up. In 2020, 663 or 17% of the total outbound numbers received the increased top-up support of €180 per month. The National Agency welcomes the support to be provided in the Erasmus+ Programme 2021-27 where a mandatory top-up of €250 per month is to be provided.

Erasmus Working Group on inclusion of students and staff with disabilities

Gerry O'Sullivan of the NA chaired a Working Group set up under the auspices of the European Commission from 2015-17. This WG developed Recommendations (See below) to support national agencies and higher education institutions in promoting a more equitable participation of students and staff with physical, mental or health-related conditions which prevented them fully participating in the Erasmus+ Programme.

Erasmus+ Support for Students with Disabilities

The National Agency collaborates with the International and Disability Offices of the HEIs in supporting students with disabilities. The NA provides additional financial assistance to about 6-9 students annually who due to their physical, mental or health-related condition require supplementary financial support to cover the extra costs of a learning mobility. This supplementary support has assisted students with Cerebral Palsy, Spinal Cord Injury, Spinal Cord Curvature, Visual Impairment, Mental Illness, Limb Amputation, Chronic Illness, Narcolepsy as well as other conditions. These mobility experiences have a profound

impact on the beneficiaries helping them to grow personally and professionally as well as augmenting their independent living skills.

Irish Universities Association

The Erasmus+ NA at the HEA was a contributor to the Erasmus+ Key Action 3 - Support for Policy Reform Project – “Enhancing Mobility of Access Students in Ireland (EMASI)”, which was led by the Irish Universities Association (IUA).

A key outcome of the project in 2018 was the development of a resource – www.mobilitytoolkit.ie - to assist HEIs who are engaged in widening participation in mobility programmes, especially for students from disadvantaged or minority backgrounds.

Report 2018

EMASI Report Launched – Department Press Release 27 April 2018

DAAD Long-term Transnational Co-operation Activity (LTA)

In 2021, the National Agency was invited to join a long-term Transnational Co-operation Activity by the German National Agency for EU Higher Education Cooperation - DAAD. LTAs are activities where national agencies and others combine their strengths/expertise to improve the quality and impact of the Erasmus+ Programme at a systemic level.

This LTA should be concluded by 2024 so as to feed its results into the mid-term evaluation of the Erasmus+ Programme. The LTA has set the following goals:

- Strategy Development · Creation of a network · Co-operation with European Commission and stakeholder groups · Mapping and mining of data · Documentation of results (progress, challenges) · Involvement of stakeholder groups.

The following are the target groups:

- NA Inclusion Officer · NA Directors · European Commission · National Authorities · Experts from relevant disciplines for selected topics (thematic, methodological) · Project co-ordinators · Representatives of stakeholder groups · Experts from relevant disciplines.

The TCA has held one meeting so far on 12 March 2021 which was attended by Gerry O’Sullivan and Aileen Marron as well as representatives from the NAs in Germany, France, Greece, Norway, Serbia, Slovakia, Netherlands and Sweden. The next meeting is planned for 18 June 2021.

Promotion

The National Agency works closely with the Association for Higher Education Access and Disability (AHEAD) and both organisations have contributed to events organised by the other party.

Erasmus+ 2021-27 and Inclusion

The new programme, which comes into effect from 1 September 2021, includes a range of measures that are specifically targeted at widening participation. The National Agency has been a leader in advocating for many of these changes over a number of years. They include:

- All National Agencies must prepare an inclusion plan.
- HEIs will get (under organisational support) an additional €100 per participant that belongs to a ‘fewer opportunities’ category.
- Students from a ‘fewer opportunities category’ will get a top-up of €250 per month for the mobility period.
- Short-term mobilities combined with a virtual component will be possible ranging from 5 to 30 days for those with fewer opportunities. Top-up support of between

€100 to €150 will apply. Travel support may also be provided.

- Preparatory visits for students/staff/parents for certain students will now be possible. This will be hugely important in addressing the “fear of the unknown” factor, which often discourages students with disabilities from undertaking a study visit or traineeship.

National Access Plan 2022-2026

The National Agency would like to request that the National Access Plan include among its goals the following or similar:

- The National Access Plan shares the objective of the Erasmus+ Programme 2021-27 that the programme should promote the values of inclusion and diversity, tolerance, and democratic participation.
- The National Access Plan and the Erasmus+ National Agency at the Higher Education Authority agree that the provisions of this plan will form the basis for the NA’s Inclusion and Diversity Plan.
- The National Access Plan supports Government and Institutional International Strategies in the area of expanding the internationalisation of the Irish higher education sector.
- The National Access Plan calls on the Access/Disability Units of higher education institutions to jointly work with the international offices to prioritise the selection of student and staff beneficiaries from categories that have fewer opportunities to partake in the Erasmus+ Programme.
- The National Access Plan and the Erasmus+ National Agency at the Higher Education Authority agree that the target groups defined in the Plan will form the basis for measuring progress in this area.
- The National Access Plan and the Erasmus+ National Agency agree that sector targets in this area will be set each year in the NA’s Annual Work Programme which

is submitted to the European Commission following agreement with the Erasmus+ National Authority – the Department of Further and Higher Education, Research, Innovation and Science.

- The National Access Plan and the Erasmus+ National Agency agree that the National Agency will retain full responsibility for the implementation of the actions detailed in the Erasmus+ Programme Guide.
- The National Access Plan to recommend that the National Access Office and the Erasmus+ National Agency hold periodic meetings to share information and to address any issues that may arise.

Submission 3.2 Irish Human Rights and Equality Commission (IHREC)

Dear Dr. Wall,

The Irish Human Rights and Equality Commission (“the Commission”) note that the Higher Education Authority and the Department of Further and Higher Education, Research, Innovation and Science are working in partnership in the development of the next National Access Plan for the period 2022 – 2026 and have opened a public consultation process. The Commission would like to take this opportunity to draw your attention to your institution’s statutory obligations under Section 42 of the Irish Human Rights and Equality Commission Act 2014, the Public Sector Equality and Human Rights Duty (“the Public Sector Duty”).

As you know, the Public Sector Duty is a statutory obligation on public bodies, in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality of opportunity and protect human rights of staff and service users. It requires public bodies to assess, address and report on progress in relation to equality and human rights, in a manner that is accessible to the public.

The National Access Plan 2022 – 2026 consultation paper emphasizes the importance of equity of access to education as it has the power to transform lives and that is rooted in principles of equality and social inclusion which have been a longstanding national policy priority in Ireland. The Public Sector Duty is a key mechanism that can be utilised by public bodies in the education sector in achieving goals and objectives and contributing to creating a society that breaks down cycles of disadvantage and embraces diversity.

The Commission sees great potential for the Higher Education Authority and the Department of Further and Higher Education, Research, Innovation and Science to play a leadership role in the implementation of the Public Sector Duty in the Higher Education sector and to incorporate human rights and equality as a central aspect of how you carry out your functions, including regulatory and oversight functions. The Public Sector Duty provides an important framework to systematically consider and reflect the particular needs

of staff and service users at risk of inequality, discrimination and socio-economic marginalisation and helps to mitigate and avoid unintended consequences.

The Commission's role in relation to the Public Sector Duty includes guidance, support, monitoring and enforcement. As part of its functions, the Commission can give guidance to and encourage public bodies in developing policies and good practice in relation to human rights and equality. Since 2016, the Commission has engaged extensively with public bodies to raise awareness of the Public Sector Duty and support effective implementation. In the Higher Education sector we facilitated a pilot project on implementing the Public Sector Duty with University College Cork and funded a number of initiatives through our grants scheme, for example with University College Dublin.

In March 2019, our core guidance was formally communicated to the heads of all public bodies, alongside a public awareness campaign. This guidance document provides public bodies with information about the Public Sector Duty, its context as it relates to human rights and equality provisions in Ireland, and sets out key steps for its implementation. In 2020, complementary guidance was published and disseminated to the heads of all public bodies and is available on our website at www.ihrec.ie/our-work/public-sector-duty.

In November 2019 the Commission hosted a high level roundtable event for regulatory and oversight bodies to support implementation of the Public Sector Duty. The Higher Education Authority was represented at this event by Dr. Ross Woods and this event highlighted the core requirements of the Public Sector Duty in the context of developing Strategic Plans and explored ways to support compliance with the Public Sector Duty through the multiplier effect that regulatory and oversight bodies can provide.

Implementing the Public Sector Duty has an important role to play in supporting Higher Education Institutions to respond positively to the diversity in Irish society and improve the quality of service delivery and the experience of staff in the workplace. In particular the Public Sector Duty provides an important opportunity for regulatory and oversight bodies to build on good practice and embed equality and human rights into their functions and processes, for example, guidance, standards, indicators, inspections and decisions.

The Commission would encourage the Higher Education Authority and the Department of Further and Higher Education, Research, Innovation and Science to include an explicit reference to the Public Sector Equality and Human Rights Duty in the forthcoming National Access Plan 2022-2026 and communicate to all Higher Educational institutions the importance of implementing the Public Sector Duty as a key way to ensure equality of access to education for a diversity of people in Ireland.

Thank you for your attention in regard to this important matter and please do not hesitate to contact the Commission if you require further information.

Yours

[Submission 3.3 Cork Education and Training Board](#)

Cork ETB welcomes the Higher Education Authority and Department of Further Higher Education, Research, Innovation and Science (DFHERIS) consultation process for the new National Access Plan that will run from 2022 until 2026. The consultation process underpinning this new Plan is critical to reflect the perspectives of the diverse range of stakeholders in education and civic society.

In 2020 Cork ETB hosted an online seminar with our learning city partners, Leave No One Behind¹, funded through the Mitigating Against Educational Disadvantage Fund. The Education Webinar, aimed to provide a high-quality platform to engage key partners across the region, including industry, arts, and culture. This enabled a balancing of critical skills for life that supports citizenship and prosperity across communities, developing social capital.

Chaired by former President of CIT, Dr Barry O'Connor, the online seminar included excellent inputs from National and International speakers including AONTAS, UNESCO, OECD, Cork Chamber of Commerce, Cork ETB, and Cork City Council. A key outcome from the Webinar, was the establishment of Cork Access Network in January 2021, which in its short existence has hosted several focus groups, soap boxes and professional development, engaging over 300 professionals involved in education and industry across Cork City and County.

In making this submission Cork ETB focused on the keys questions as presented in the HEA and DFHERIS consultation document. We consulted with our colleagues internally across Cork ETB further education and training services and hosted a learner forum, to specifically capture the voices of our FET learners.

Vision for equity of access to higher education in Ireland in 2022-26

The vision for equity of access to Further and Higher Education in Ireland 2022-2026, should reflect the diversity of Irish society. Education should be understood in the broadest sense and underpinned by a commitment to education as a basic human right. It should be underpinned by the UN Declaration of Human Rights. Article 26 states

“Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit”².

Furthermore, the Sustainable Development Goals and the 2030 Agenda is a universal and collective commitment by governments, civil society, the private sector, youth, UN and other multilateral agencies to tackle educational challenges and build systems that are inclusive, equitable and relevant to all learners.

Who are the target groups? How do we ensure the most vulnerable members of our society are included?

People and communities not currently accessing education. It is important to recognise in identifying these groups of people, their needs are complex and their opportunity to access education involves other factors in particular housing, financial support, ability to access part time provision, language support, opportunities to access employment/work placements, health, negative experience of education, no family or social network or support. People identified need to be part of a whole system approach. It is imperative there is a wraparound response. Target groups may include but are not exclusive to - people in or exiting from prison services; people recovering from addiction. Persons with a disability; early school leavers; the unemployed; migrant communities; members of low-income families; carers; young people leaving care, members of the Roma and Traveller community; mature students.

There were 13,098 learner enrolments in further education and training who identified as having a disability. 66% were older than 25 years which indicated that many are returning to education, so there are gaps from disability services in school. It is important to recognise that FET PLC Students with a disability often need to complete a course over two years rather than one. Currently if a student qualifies for a grant it applies for one year only. There needs to be an option available for these students to complete half of the components in one year and half the following year. There needs to be recognition for students with disabilities to receive funding over an extended period and should be recognised across all FET and HE programmes³.

Data from enrolments in further education programmes showed that more than 40% of Travellers, had previously only completed primary level at most. Nationally, Traveller enrolments in further education and training was 1,212, of which 41.2% had primary education or lower, with the majority unemployed, 59% for a year or more. Furthermore, one-third of those from the Roma Community who signed up for further education programmes last year had primary education or lower⁴.

The expansion earlier this year of PLC courses to learners in the asylum-seeking process was very welcome. There has been an increasing demand for English language support from new migrants in FET, with around 20,000 learners, nationally, availing of this ESOL provision each year. This is critical in helping migrants to integrate within communities and to secure and sustain employment.

Career guidance staff and aftercare social workers can struggle to advise people as to whether they qualify to apply for a grant or not as the immigration and nationality requirements are complicated and confusing. Ireland's immigration system allows for

immigration residence permissions appear to be the same (for example Stamp 4) and offer the same access to the labour market, citizenship, and security of residence to provide for divergent levels of access to other supports such as housing and education. Non-EEA migrant children who are in the care of TUSLA, whether that is because they entered the State as an unaccompanied minor or there was an intervention by Child Protection following a bereavement of a parent or guardian, a family breakdown or abuse, may be given an immigration permission. This immigration permission places them at a significant disadvantage to their Irish or EEA citizen counterparts when applying for third level or further education as they are now deemed ineligible for a student grant⁵.

Case Study: Cork ETB Dillon's Cross Project

The Dillon's Cross Project was set up in 1995 to offer education and support to the female relatives of prisoners and ex-prisoners. The project aims to offer the female participants an opportunity to get QQI qualifications at level 3 and 4 with a view to helping them move onto level 5 Further Education and Training or into employment. The project originated in the Education Unit, Cork Prison, where it was felt that female relatives should have the same education and developmental opportunities as the men in prison, thereby fostering a positive attitude towards education and promoting education among families.

"My name is Mary Smith. My father is a Traveller, though I am settled. My partner and father of my two children is just out of prison. He is battling with drug and alcohol addiction, and we are currently trying to get him into rehab with the help of the Dillon's Cross Project. He has been in prison for most of my children's lives. My eldest child has autism, and we struggle to cope daily. I have completed both phases of the Dillon's Cross Project and the project has given me huge help and support. I hope to return to education to complete L5 and L6 in youth and community work as soon as both of my children are in full time education".

(Names have been changed)

A couple of key factors contribute to the overall success of the Dillon's Cross project and should be considered in supporting vulnerable learners –

- Proximity of the project to where learners live
- Scheduling/timing of classes allowed children to be dropped to school and then I could attend the project. The project followed the academic calendar so that when my kids were in school, so was I and vice versa.
- Support of the staff with additional tuition when necessary
- QQI approach - modules allowed a steppingstone approach.
- Holistic support of the project

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

The Further Education and Training Strategy identifies the lack of exposure to vocational learning, and vocational options or pathways during the junior and senior cycles in many schools. ETBs have the advantage of operating many second-level schools which could facilitate piloting of an innovative approach. This could look at offering Level 5 and Level 6 modules as an integrated part of the senior cycle alongside other options and components. This should be investigated further as part of the NCCA senior cycle review⁶.

Currently approximately 10% of HE places are available for FET/QQI applicants where there are equivalent opportunities to meet the entry requirements with a QQI (Quality Qualifications Ireland) award. Increasing this quota would develop the progression route from FET. From DEIS schools there are a higher percentage of learners progressing to FET and thus relying on QQI for entry to HE. (Rates of progression to HE is rising but whilst nationally 80% go from school to HE, it is only 64% progression from DEIS schools, with significantly more students going towards FET). For them the 10% quota of QQI entrants into HE narrows the window of opportunity to apply to HE. Providing a quota of HE places specifically for students meeting the criteria of applying with QQI/from FET AND from a DEIS school might increase the flow and opportunity for more disadvantaged learners.

FET supports early school leavers by offering them routes back into education and training through Youthreach centres and CTCs. There is a need to link it to pathways within FET and beyond, evolving to meet the changing and more complex needs of its learners. The Universities in Cork (UCC/MTU) have excellent access programmes to support young people coming from DEIS schools, however the real beneficiaries are those that go on to HE while those who do want to progress but go to a PLC college, often find it difficult to source continued support to enable the transfer from school to FET.

Case Study: Cork College of Commerce/ Youthreach Communications

In 2019 Cork College of Commerce initiated a programme with Youthreach centres in Cork, in which existing learners could attend the college one morning a week to complete the QQI Level 5 Communications component. This was an effort to integrate them into a college environment completing college work whilst still being supported by their centres. It reduced the workload for those who choose to progress to PLC by having one component completed. 21 learners commenced the programme in September 2019 and 17 were actively attending prior to the March 2020 Lockdown.

Through course shadowing at Cork College of Commerce prospective students gained a valuable insight into both their chosen course and what it is like to study at Cork College of Commerce. It provided information, advice and support to students who were interested in

a particular course. As well as getting to shadow the classes of their chosen course they have the opportunity of meeting subject teachers and sampling the facilities that the College has to offer.

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

A considerable number of our EU partner countries offer free education for their citizens. Ireland has one of the highest rates for third level education in the EU. While it is recognised that the funding of a free education system is a significant demand on the public exchequer, the economic and social contribution that is derived from the investment plays a significant part in national growth and development. By removing barriers that inhibit or prevent individuals from more marginalised sectors of society from participating fully in post second level education considerable progress can be achieved in areas that include social and community cohesion, improved health, and wellbeing as well as economic prosperity.

Opening SUSI for part-time learners would significantly increase participation for adult learners. SUSI's 'full time only' criteria exclude a significant cohort of potential learners who may be working, parenting or both. By opening SUSI for part time learners, people working, and parenting can still pursue an education and will repay the state multiple times over eventually.

It would be more cost effective to loosen the eligibility criteria for the Back to Education Allowance through DSP (Department of Social Protection) and allow students to work part-time while receiving the allowance. Traditionally, students in receipt of BTEA could work part time but that changed in 2017 where they now lose the day's pay from DSP if they work so much as one hour in that day. This was a regressive move and left students in financial difficulties. For those not eligible for BTEA, an increase in the SUSI maintenance grant would encourage more non-traditional learners to apply.

FET Students, including some in receipt of SUSI grant, may be subject to QQI Exam fees and course materials costs which can be considerable. These additional costs, which are not covered by the funding allocated for course delivery, relate to items specific to the course such as uniforms and kits, place a significant additional financial burden on learners. The extension of a Student Assistance Fund like that available for Higher Education should be expanded to FET.

For FET learner's ineligible for BTEA, SUSI fees and maintenance grant should be made accessible if they meet the criteria. The criteria and process of applying for student support funding should be clearer, less restrictive, and more accessible for all learners. It needs to reflect and respect the fact that many applicants from non-traditional cohorts would find current application processes and requirements confusing and intimidating.

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

Better communication that the HEAR and DARE scheme is available for FET graduates – it is advertised as a School Leavers programme, implying that it is not targeting FET students. HEIs do accept HEAR eligible students who have applied through CAO with QQI qualifications for all the HEAR supports (except for the 'reduced points entry' which applies to Leaving Cert points entry only).

More could be done to recognise the numbers of students who may have taken several years out of education after second level before returning to FE (with a view to progression to HE), particularly those from identified target groups. They should be targeted for mentoring / preparation for HE, providing support, information, experiences, and links. A presence from HEIs within FE would help to encourage these learners and their transition into FE and on to HE, as it is often a very separate experience for learners as they move between organisations (school-college-University) with little continuity of support.

Provide Traveller led outreach programmes like the Primary care model that has had enormous success and create similar models for other communities identified under priority target groups.

Build on community education approach, create outreach models connected to the FET/HE institutions in the area. The introduction of online learning creates new possibilities for off campus learning in community-based settings, where learners may feel more comfortable and have access to smaller class sizes and additional supports.

Enhance the family learning programme. Family Learning works with parents to develop their interests, abilities and knowledge in order to help them better support and encourage their children's educational attainment. This approach improves the literacy and numeracy of both parents and their children because it creates a bridge between home and school, and between home and adult learning opportunities⁷.

Equality of access cannot stop once a learner gains entry to the setting; learners also require equality of condition and equality of outcome to ensure that equal opportunities and success criteria are achieved. Factors of marginalisation and exclusion can relate to all aspects of the curriculum, school or classroom organisation, assessment, cultures, policies, and practices⁸.

Case Study: Cork ETB/UCC ACCESS+ Programme

ACCESS+ was established by UCC PLUS+ in response to an identified need to support the significant numbers of students from DEIS second level schools in Cork City who were progressing to Further Education. Many of these students were identified as having an interest in and the potential to succeed in Higher Education. However, due to a range of social, cultural, financial, and educational barriers they were not able to proceed directly to Higher Education. ACCESS+ aims to increase the numbers of students from under-represented groups in Higher Education, by supporting students on their transition through education, starting in second level (pre-entry to FE), throughout FE (post entry to FE) and then as they explore and apply for progression to, HE. Supports are provided to learner both pre-entry to FET and when they enter FET. The ACCESS+ Officer was appointed in Winter 2019. Although the ACCESS+ Officer is in Cork College of Commerce he supports learners in all the three city-based PLC colleges. The inaugural year of this initiative is currently being reviewed and feedback thus far is positive. One learner commented, “I’ve accepted my offer for Commerce in UCC. I’m super delighted and can’t wait to begin. Just want to thank you for always being there in regard to answering all my questions that I had and really someone I could talk to when I felt a bit unsure. As the ACCESS+ initiative continues to grow this will be a great support for Cork ETB learners to assist them to progress to UCC.

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

Cork ETB colleges have several Memoranda of Understanding which exist between Cork ETB centres, and HE institutes in Ireland and abroad, in addition to the Cork College Colleges Progression Scheme (CCPS) and UCC ACCESS+. Advanced entry is possible from some Cork ETB courses linked to specific linked HE programmes.

Cork ETB College/Provider , Higher Education Institute

Cork ETB , Waterford Institute of Technology

Cork College of Commerce , Advance Entry to MTU (Kerry Campus

Cork College of Commerce , Advanced Entry to Business Studies in Griffith College Cork

Cork College of Commerce , Nursing Degree programmes in the UK

Cork College of Commerce , Psychology Degrees in Scotland

Mallow College , Nursing Degree programmes in the UK

St. Johns Central College , Advanced Entry to MTU (Kerry Campus)

St. Johns Central College , Advanced Entry into the Bachelor of Science Degree in Computing Limerick Institute of Technology

St. Johns Central College , Veterinary Nursing in Edinburgh Napier university

St. Johns Central College , TV and Video Production, Fashion Design, Interior Design, University of Sunderland

Kinsale College , Advanced Entry to BA (Hons) in Sculpture and Combined Media in Limerick Institute of Technology

Nationally, FET transitions already account for around one-fifth of the annual intake of the technological higher education sector and about one-quarter of annual Level 5 and Level 6 PLC FET graduates per year. An action plan has been agreed to work towards a more strategic and consistent transitions approach between key stakeholders⁹ as part of the work of the Transitions Reform FET-HE working group. The actions identified include setting national targets for FET-HE transitions and embedding these within HEI performance compacts and ETB strategic performance agreements¹⁰.

Develop a collaborative FET/HE approach to regional skills development.

Better employer/industry engagement to support work placement modules in FET/HE. Many students do not have the necessary social or life experiences to enable sourcing appropriate work experience which now a days is a significant component of any courses in FET and HE. Employer training awareness should also be factored in.

Standardisation of university entry requirements for FET graduates, building on the common system across the technological higher education sector.

Consider the potential for greater recognition of FET awards in comparison with Leaving Certificate points within the CAO and how this might be benchmarked¹¹.

Case Study: Cork Colleges Progression Scheme

First established in 2006, Cork ETB has had a long-standing joint progression initiative with CIT (now MTU Cork) - the Cork Colleges Progression Scheme (CCPS). CCPS is available to Cork ETB learners who complete a QQI Level 5 or QQI Level 6 programme with:

- Colaiste Stiofáin Naofa
- Cork College of Commerce
- Kinsale College
- Mallow College
- St. John's Central College

Under CCPS, several courses in MTU Cork Campus are linked to certain courses in Cork ETB. MTU Cork Campus reserves a few places on these linked courses for applicants who achieve specified levels and other requirements in their QQI award. A CCPS working group comprised of staff from MTU Cork Campus and Cork ETB meets at least twice a year to discuss and review progression arrangements.

CASE STUDY: Cork ETB - Education Unit, Cork Prison

The Cork Education & Training Board began providing an education service to Cork Prison in 1978 on a part-time basis initially and has expanded to keep pace with the increase in the prison population. Education is available to all people on entry to the prison.

“My name is Joe Smith. I come from a large Irish family. I struggled in school due to learning difficulties. This led to me being expelled by first year. I then attended Youth reach but soon found myself on the streets, hanging around bored. By sixteen, I discovered drink and drugs. Very quickly, my behavior spiraled out of control, which led to dealing drugs and serious criminal activities, which led to a long prison sentence.

After 5 years in prison, I overcame addiction and decided to give education a second chance. This was my biggest step as my previous experience with education was so difficult. I received a lot of one-to-one tuition, which gave me the confidence to keep trying. I have now completed many QQI modules at level two and three. I have also completed the Red Cross program. However, I am most proud of completing a criminology course with UCC and receiving a certificate of excellence. I can now see a new path for my future and plan to continue studying.

Supporting/enabling factors

One to one tuition

Encouragement and support from family on the outside

Addiction Counselling

(Student name have been changed)

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

The SOLAS strategy identifies that the FET College of the future, will serve as a community resource, with facilities used for a range of societal and cultural purposes.

It is intended to develop a community education framework by SOLAS, ETBs, community education providers, learners, and relevant stakeholders¹² that will provide an enhanced basis to both record and promote national and local good practice, learner achievement and progression, gathering basic learner data, linking to learning pathways, and offering consistent learner support. Cork ETB has developed strong relationships with community and civic organisations for example Cork Alliance, the library service, all of which serve to support the learner through a holistic model of education. The Mitigating Educational Disadvantage Fund¹³, supported and enabled hard to reach groups engage in education through a community education approach should be long-term and provided in a sustainable manner.

Consistent learner support, investment and expansion of learner supports in Further Education. A high proportion of learners are citing mental health issues, particularly around learning at Levels 1 to 3. FET must ensure it has robust and consistent support mechanisms in place to help this cohort transition through FET.

Role of youth work to provide mentoring to 17-24 age group to return to education or transfer between FET settings. Youth work is a key enabler to supporting young people at critical junctures, particularly between primary and second level. A similar approach should be devised to attract and support older young people who may have disengaged from education or social services.

Technology also offers significant potential to build on community education and widen access to the most marginalised groups, particularly those in rural areas who cannot travel to major FET or HE colleges or who are constrained from leaving their homes due to care duties or other circumstances.

Case Study: Northside Community Enterprises

Northside Community Enterprises (NCE), philosophy is that all people have the right to integrate with others, to re-educate, train, work and gain the relevant experience to progress to future full-time employment. The aim is to promote social inclusion and provide accessible training & educational opportunities. NCE provide Community Employment Schemes that are developed to help people who are long term unemployed or otherwise disadvantaged by offering a variety of sector specific work placements as well as a range of training programmes that aim to develop individual's career pathway.

Cork ETB through the Blackspots for Unemployment and Marginalised communities programme identified Northside Community Enterprises for 2 programmes;

1. Northside Community Enterprises – Building Sustainable Futures – Construction Skills
2. Northside Community Enterprises – Workwise Skills

Each programme involved 3 phases:

Pre-Engagement Strategy Phase - including recruitment, assessment, induction, literacy and numeracy support, personal development and guidance.

Learning Strategy Phase – Development of the appropriate skills set for the learners with wide and varied taster and QQI accredited components on offer.

Progression Strategy Phase – Assist and guide participants in developing a progression plan into further education, training or employment with the support of Adult Guidance Services and CETB staff to guide on progression options.

Soft Skills and Resilience Training was provided throughout the programme as a core pillar to keep learners focused and engaged.

Transition coaching was provided to the cohort of learners who were job ready and ready to move to further & higher education.

Cork ETB provided real links and pathways for progression. Many learners found that the personal development, professional development and experience with QQI modules a great benefit and developed short- and long-term goals for their future education, training and employment needs. By linking with NCE and CETB staff, tutors and CETB Adult Guidance Service, the participants were aware of the options and supports available to them for education and training progression.

Impact of Covid 19

The impact of Covid 19 has been well documented and there are several key research reports¹⁴ now available documenting same, both in the education sector and society at large. Notwithstanding the challenges of Covid on people's emotional and personal health, poor broadband, lack of devices, pivoting to online learning etc. there has also been several success stories and opportunities emerging.

Online learning has provided unique opportunities for learners who would have been hard to reach, due to physical location and new social networks to engage in learning. Learners at all levels have been enabled to access education in ways previously thought impossible.

The Mitigating Against Educational Disadvantage Fund as previously referenced provided a welcome investment in community education, particularly in devices and I.T facilities such as white boards for remote classes, dongles for learners and laptops.

Conclusion

In line with SOLAS FET Strategy 2020-2024, Cork ETBs FET Directorate's strategic area of Active Inclusion recognises the necessity of consistent and integrated learner supports in enabling people and communities, to have an opportunity to learn and develop. Cork ETB aims to ensure that learner supports are aligned with the Universal Design for Learning (UDL) framework. The HE sector in Ireland has recognised the importance of inclusion and Level 1 of the Inclusive Education Pyramid¹⁵ by embracing UDL as a concept, with Disability Officers and Access Officers championing its application. UDL for FET also needs to provide an approach that offers real opportunities for a diversity of learners seeking equality of success. Cork ETB advocates that fundamental to the success of the National Access Plan is creating and resourcing a learning and training environment as inclusive of the greatest diversity of learners as possible in further education and training.

"The only way to help people forward, is through building relationships and understanding where their journey begins, not focusing solely on where you want them to be."

Submission 3.4 National Traveller MABS

- The updated plan for equity of access to higher education could be developed using a new model based on the EquiFrame. A new vision for the NAP that reflects the issues highlighted by the pandemic would put a fresh lens on diversity, equality and inclusion.
- The initial groups targeted in the National Access Plan 2015 -2019 should remain included in the next National Access Plan 2022-2026.They need to be redefined to reflect the needs of society today including those in direct provision and recognise outstanding gender issues.
- The target for full and part time undergraduate new entrants from the Traveller community has not been reached and it falls approximately 50% short of the initial target. This cannot be deemed a successful outcome and it is imperative that Irish Travellers remain as a target group for the next NAP.

- The commitments to support students in other categories of disability and to reevaluate those who should be included in the target group defined by socio-economic barriers need to be upheld and implemented in the NAP 2022-2026.
- PATH 1 funding should be increased so that we achieve a higher rate of diversity amongst teachers. This aligns with Action 15 of the National Traveller and Roma Inclusion Strategy 2017 -2021 to support the development by the higher education sector of positive action measures to encourage and support Travellers and Roma to become teachers and should be more target towards Travellers to increase student retention at second level and progression to third level.
- The 1916 Bursary scheme needs to be extended indefinitely beyond the current 3 year extension that began in 2020/2021.
- More 1916 Bursary's should be made available to the targeted groups to further increase participation and the financial support available to students most in need of it.
- The 1916 Bursary should be available from all recognised higher education institutions rather than being limited to the 22 named institutions.
- PATH 3 funding needs to be more targeted at developing relationships between HEI's and local schools and colleges of Further Education. Career guidance needs to be more targeted and supportive and understanding of the social and cultural issues faced by those in the specified groups. A one size fits all approach does not work.
- The SUSI grant amounts and the adjacent and non-adjacent rates need to be re-examined to take into account the actual cost of living for students and their particular circumstances.
- There needs to be increased flexibility in the SUSI application, decision and appeals process to take into account individual circumstances, particularly in the Covid-19 era.
- SUSI applicants should be able to retain their current social protection entitlements.

- Those in receipt of the Back to Education Allowance payments or VTOS payments should be entitled to receive the maintenance part of the SUSI grant to ensure wider participation of those from low income backgrounds in further and higher education.
- The eligibility assessment on gross income needs to be readjusted to take into account the financial realities of student households.
- All funding available through SUSI, the 1916 Bursaries and other mechanisms should be extended to cover part-time and mature students as well as all registration and associated costs as many prospective Traveller students are mature and are applicants for part-time routes
- The SUSI grant system be expanded to include part time and online accredited programmes.
- HEI campuses should be funded to provide a safe and welcoming environment for Traveller students on campus through the creation of Traveller societies. It would be a point of contact and culturally appropriate support for Traveller students including a mentoring or buddy system. These would help to build positive relationships as well as alliances between Traveller students and the rest of the student and staff body. These groups could work towards increasing Traveller participation in third level education, while providing a safe and welcoming space on campus.
- Traveller students should be included in college promotion and induction sessions.
- Higher Education Institutes should employ Traveller graduates in access and support services.
- A State sponsored low interest education loan for living expenses, repayable after graduation when borrowers start earning above a minimum income level should be investigated.

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

National Traveller MABS acknowledges and welcomes the fact that there has been significant additional investment in new access initiatives since the commencement of the NAP. The Government has committed over €30 million over the years via the Programme

for Access to Higher Education Fund (PATH) to increase access to higher education by the target groups identified in the NAP.

PATH 1 funding is for supporting access to initial teacher education by the target groups. The focus on the profession of teaching is crucial, and is informed by the understanding of the power of teachers as role models and influencers in raising the aspirations of young people. PATH1 aims to increase the number of students from under-represented groups entering initial teacher education and to provide more role models for students from these groups, demonstrating that there are pathways open to them to realise their potential through education. This aligns with Action 15 of the National Traveller and Roma Inclusion Strategy 2017 -2021 to support the development by the higher education sector of positive action measures to encourage and support Travellers and Roma to become teachers. In order to increase the numbers of Irish Travellers entering higher education there needs to be an increase in the numbers of teachers from the Traveller community to provide more role models for students and to show them there are pathways open to them.

PATH 2 funding comprises of the 1916 Bursaries. The 1916 Bursaries are targeted at non-traditional entry and can support undergraduate study on either a full- or part-time basis. Each bursary is worth €5,000 per year. 200 Bursaries are available per year. A number of Travellers have benefited from the Bursary. The 1916 Bursary scheme needs to be extended indefinitely beyond the current 3 year extension that began in 2020/2021. More Bursary's should be made available to the targeted groups to further increase participation and the financial support available to students most in need of it. The Bursary should also be available from all recognised higher education institutions rather than being limited to the 22 named institutions.

PATH 3 funding is dedicated to building and enriching relationships between higher education institutions and regional and community partners to enable better targeting of students. To this end there needs to be a concentrated effort to strengthen existing links between the Career Guidance Service and Home School Liaison Scheme in schools and access officers in higher education institutes with a view to working the Traveller community. Targeted events and initiatives such as College Connect and the SOAR program's Whidden Workshops: It's Kushti to Rokker [Chat Workshop: It's Good to Talk] for Traveller and Roma students who are considering further or higher education should be supported by PATH 3 funding as they provide a real connection and chance to speak to HEI's staff and admin as while being led by Traveller and Roma students sharing their experiences and talking about the specific issues they faced and answering questions put to them by potential students. Similarly NUIG regularly promotes Traveller cultural events on campus, and organizing panels of Traveller students to talk to potential Traveller students about college life. As part of the efforts by the University's Access Office to support Travellers as role models and their participation in education a short documentary 'Travellers in Higher Education – Building a Sense of Belonging' was produced. NUIG is also home to The Mincéirs

Whiden Society, the first Irish Traveller Student Society in Ireland. It aims to provide a safe and welcoming environment for Traveller students on campus. In addition, the society intends to build positive relationships as well as alliances between Traveller students, the student and staff body at NUI Galway. The society aims to work towards increasing Traveller participation in third level education, while providing a safe and welcoming space on campus. These types of initiatives are invaluable as they provide safe spaces as well as visibility and support for Traveller students and such initiatives should be further resourced.

HEI's could also support awareness of Traveller culture and diversity by introducing modules on Traveller culture and including Traveller culture and history in pre-existing modules. Traveller students should also be included in college promotion and induction sessions and employ Traveller graduates in access support services.

Covid-19 has had a severe impact on students and their family's ability to afford 3rd level education. A recent survey of third level students found that household Income has been reduced for 56% of students and over 77% of students and their families are experiencing financial stress and anxiety. While over 80% of students are concerned or extremely concerned that they won't have enough money to go to or remain at college. Those eligible for the full SUSI grant continue to struggle financially with almost 65% say it is not adequate to meet third-level education costs¹³. While there has been an increase in the grant this increase does not fully reflect the cost of attending college today. The accommodation allowance payment needs to be realistic given the accommodation crisis and the ever rising rental costs to students. The non-adjacent rate of SUSI needs to be recalibrated to recognise the reality that in most rural communities there is no public transport service and while the student may live within 45km of their college the costs to get there can be significant as there is no bus service or easy access to college for these students. The cost of food and utilities continues to rise year on year and the SUSI grant amounts need to be seriously overhauled to reflect the realities of the cost of living for students today.

The financial costs incurred while accessing further education and training courses are a barrier for low income households. PLC students are only eligible for maintenance grants and students in receipt of a BTEA (Back to Education Allowance) or VTOS (Vocational Training Opportunities Scheme) payment are not eligible to receive the maintenance grant leaving them in a precarious position. A St Vincent De Paul report has found that course fees can cost up to €1,000 depending on the course materials needed for Post Leaving Certificate students¹⁴. This is unfair, particularly as students deemed to be from low income household tend to enrol in PLC courses.

Many of the most vulnerable in higher education are mature students, those who have a disability or an illness and come from low income households. Upon entry to higher education, those on payments such as carer's allowances, jobseekers allowance, and / or disability may be forced to change to the Back to Education Allowance (BTEA) payment to

keep entitlements such as the Housing Assistance Payment (HAP) or rent supplement and other social welfare scheme and supports. Those in receipt of the BTEA payments are not then entitled to receive the maintenance part of the SUSI grant. This should be recognised as a significant barrier to widening participation of those from low income backgrounds in higher education and should be examined as a matter of urgency.

There are currently nine institutions listed on the SUSI website not eligible for funding even though they provide courses that are offered through the CAO15. This is a barrier to those trying to attend courses at these third-level institutions and grants should be made available to students based on their individual circumstances meeting the criteria required by SUSI rather than on what education institution they would like to attend. Courses available through the CAO should be automatically eligible for SUSI.

National Traveller MABS is of the opinion that part time students should be afforded the same supports that are available to full time students. According to the HEA Eurostat Survey (2016), of the expenses being paid by students, the average expenses for part-time students (at both the undergraduate and postgraduate level) was higher than full-time students¹⁶ All funding available through SUSI (Student Universal Support Ireland), the 1916 Bursaries and other mechanisms should be extended to cover part-time and mature students as well as all registration and associated costs as many prospective Traveller students are mature and are applicants for part-time routes.¹⁷ Furthermore part time study or online accredited programmes may be the only appropriate further education option for those with disabilities and learning difficulties such as autism. Such courses are excluded from SUSI funding leaving people unable to access suitable third level education.

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

Covid-19 has had a severe impact on students and their family's ability to afford 3rd level education. A recent survey of third level students found that household Income has been reduced for 56% of students and over 77% of students and their families are experiencing financial stress and anxiety. While over 80% of students are concerned or extremely concerned that they won't have enough money to go to or remain at college. Equity of access to higher education has to begin by addressing the financial burden associated with attending college. It is time that a State sponsored low interest education loan for living expenses, repayable after graduation when borrowers start earning above a minimum income level be investigated. Similar schemes are in operation in Australia, Netherlands and England.

The move to online learning also highlighted the digital divide that exists between Travellers and the wider community. Travellers are in the midst of a serious accommodation crisis and as a result many live in overcrowded accommodation and so finding quite spaces to attend

online lectures and study was difficult. There was also the issue of not having access to laptops and computers at home as well as the lack of broadband or internet connections to many sites and housing schemes. These issues further widened the divide between Traveller students and the majority population students. Challenges created by the COVID-19 crisis are already yielding evidence that progress to date in Traveller access to and progression in education will be regressed. Participation in Higher Education was difficult before, but COVID-19 has added another barrier and it is likely that this gap will get bigger. The danger now is that ambition to progress to third level will be reduced through lack of direct contact and encouragement from teachers for second level students.

Submission 3.5 NCSE

Introduction

NCSE strongly welcomes the HEA's National Access Plan 2022-2026, particularly its vision for equity of access to higher education for all students with disabilities to adult educational settings. This vision enables the NCSE to continue in its goal to remove barriers, to widen participation, and to enhance the inclusive educational opportunities for all learners with disabilities to access further and higher education. The development of a continuum of further and higher education will support students to access a more integrated third level system facilitating a widening of options available to students with disabilities. Creating a robust transition support at post primary level will facilitate students' successful transition from post-primary school to adult education.

In supporting a widening of access, the National Access Plan will enable the participation of all students leaving school to access a system that is flexible and holistic with an emphasis on skills for life. This system reflects social, participatory and community engagement and successful academic outcomes for all students. This includes looking at options within further and higher education that support long term meaningful engagement and participation in adult life. Currently, there is significant variability in the options available to students upon leaving post primary and special school settings from both a geographic and accessibility viewpoints.

This paper highlights some considerations for the National Access Plan around definitions and categorisation, and planning for further and higher education of young people with disabilities emulating the social model of disability. It utilises a framework for inclusive further and higher education development and considers an implementation process that incorporates the voice of individuals with disability, the environment or educational institutions to support meaningful engagement, and participation for all to ensure for better outcomes.

The Education for Persons with Special Educational Needs Act 2004, while still not fully commenced, points to the need for significant early planning around school leaving to ensure that a child can continue their education or training on leaving school. Section 15, which is yet to be commenced, sets out the following:

Planning for future education needs.

15.—(1) In preparing or reviewing an education plan, the principal of the relevant school or relevant special educational needs organiser shall, from the child's attaining such age as the principal or organiser considers appropriate, have regard to the provision which will need to be made to assist the child to continue his or her education or training on becoming an adult.

(2) In performing the functions under subsection (1), the principal or the special educational needs organiser shall—

(a) ascertain the wishes of the child concerned and of his or her parents, and

(b) take such steps as are necessary as will enable the child to progress as a young adult to the level of education or training that meets his or her wishes or those of his or her parents and that are appropriate to his or her ability.

(3) In preparing or carrying out a review of an education plan in respect of the child who has special educational needs and who within the following 12 months will reach the age of 18 years, the Council shall cause an assessment to be made of—

(a) the extent, if any, to which goals set out in any previous such plan or the plan, as the case may be, successfully met the special educational needs of the child or student, and

(b) the reasons for any failure to meet those goals and the effect any such failure has had on the development of the child,

and the plan shall include measures to address any such effect.

Other sections of the Act set out some functions for the NCSE in relation further and higher education, rehabilitation and training. Section 7 (3) of the Disability Act 2005 provides additional functions and took effect for adults who turned 18 years of age in June 2020.

NCSE considers that the Access Plan should be cognisant of the need to build in transitional planning at an early stage for students with disabilities.

In considering our functions, the NCSE commissioned two research papers, mapped post-school options for young adults (2014) and developed some information pamphlets (2018) which may inform and assist the development of the Access Plan as follows:

☐ NCSE Research Report 14 (2013): Moving to Further and Higher Education: An Exploration of the Experiences of Students with Special Educational Needs

Authors: Conor Mc Guckin, Michael Shevlin, Sheena Bell and Cristina Devecchi

- NCSE Research Report 15 (2013): What Works in the Provision of Higher, Further and Continuing Education, Training and Rehabilitation for Adults with Disabilities? A Review of the Literature
- Authors: Carmel Duggan and Michael Byrne
- Information on Post-School Options for School Leavers and other Adults with Disabilities: Further Education and Training
- Information on Post-School Options for School Leavers and other Adults with Disabilities: Higher Education
- Information on Post-School Options for Rehabilitative Training and Adult Day Services
- Information on Options for Adults and School Leavers with Disabilities: Post-School Education and Training

All of the above may assist in this and other considerations and are available to download at www.ncse.ie. Hard copies of these documents are available on request.

Definitions and categorisation

The achievement and status of educational attainment can be life enhancing for individuals with disabilities and, for some, can ensure a positive vocational outcome allowing for greater independence and participation in society.

Clarity is required regarding the **definition of higher education** and the current distinction between higher and further education. In reading the documentation, it is unclear if all education and academic levels are of interest to the National Plan group.

Review of the alternative accreditation options would be helpful, especially in the context of recent university inclusion initiatives such as the Trinity Centre for People with Intellectual Disabilities. The academic demands of the traditional definition of higher education (Level 7 and Level 8) are not achievable for some people with disabilities. Many adults with disabilities can engage meaningfully with Level 4 and Level 5 certification and in adult education programmes. These give great satisfaction and personal achievement for students and, for some, provide a pathway to employment for students.

A further issue for clarification is the **categorisation of disability** limited to “physical mobility”, “deaf/hard of hearing”, and “blind/vision impairment”. Little information is given about the

participation of people in categories groupings such as those with intellectual disabilities, complex learning difficulties, complex medical conditions, or autistic individuals. Their number, as a proportion of the population, is far greater than the three categories of disabilities referenced above.

There is little reference given to people with enduring mental health conditions. Mental health challenges can, and do, manifest in late adolescence and into early adulthood. This particular cohort of young people have specific support needs while they manage intense disruptions in their lives. The impact of the Covid pandemic on young people requires consideration. It is widely acknowledged that mental health support is an under resourced area. Therefore, we believe it is important to include it within the categorisations to ensure access to appropriate supports for young people with co-occurring disability and mental health needs to enable them to engage in higher or further education. NCSE considers that the National Access Plan should refer to all people with disabilities and complex health needs.

Social Model of Disability Perspective

The social model of disability looks at environments and supports surrounding an individual, specifically how the environment can support individuals and promote their meaningful participation in society. With regard to the statement in the submission that “some prospective students simply do not see themselves as belonging to a university, institute of technology or college in the first place, we suggest that this needs to change” (p2). An alternative statement could state that educational institutions are not featured in the lives of some groups and communities due to current barriers that exist. The National Access Plan should outline the expectations on institutions to support and promote students with disabilities to meaningfully participate in what they offer in terms of their relevance, and their positive future outcomes in the lives and communities of focus. It also needs to consider the views of those who currently do not attend further and higher education and why this is the case.

Removal of barriers to access

The ‘mainstreaming’ approach to support systems is one practical way to remove the many barriers individuals with disabilities experience when attempting to access further and higher education. The issues below give some indicate this need for review.

- There is currently no funding available for supports such as access to transport or an educational care support worker (equivalent role to an Special Needs Assistant and primary and post primary level) to learners with disabilities who are registered on courses at QQI level 1-4. In addition, there is no funding available for learners who wish to study on a part-time basis.

- Funding under the Fund for Students with Disabilities (FSD) requires that students are registered on full time courses which are accredited at QQI level 5/6. This excludes a large cohort of students with disabilities from accessing support.
- Solas manages the administration of this fund in conjunction with the Education & Training Boards. Solas took over this role for the further education sector from the Higher Education Authority in September 2020.
- Some learners receive funding to support their education from both the HSE and Solas via the FSD. Currently, the experiences of students indicate that the government departments do not communicate with each other, leading to a fragmented and ineffective service.
- Some colleges of Further Education offer Adult Leaving Certificate programmes. If a person with a disability wishes to enrol on any of these programme, and he/ she requires funding for supports such as an educational care support worker (equivalent to an SNA), he/ she cannot access funding as he/she is over 18 years. This is a current barrier in the system as this cohort of learners are not catered for. Funding cannot be accessed via the NCSE or Solas.

The National Access Plan should build on the considerable experience and capacity available to students with disabilities from their schools, disability groups, disability services, community voluntary groups, and the State agencies currently involved in supporting individuals and groups in education.

Measuring outcomes

We suggest a need to reflect more broadly on outcome measurements in the context of the social model of disability. Currently the plan details numbers of students entering and exiting the student body. A more holistic measure is required that provides information on not just academic outcomes but also life outcomes and captures those who may not complete further or higher education. The lived experience of students with disabilities, acknowledging their voice as central, is a very rich and informative mode of capturing the outcomes of this plan. Identifying the supports and barriers to engagement in further and higher education is also essential to inform policy moving forward.

The NCSE interprets educational outcomes to include academic achievement; attendance-related such as completing programmes; happiness-related outcomes such as confidence, wellbeing, positive relationships, attitude to learning, engagement in extra-curricular activities, and quality of life indicators; independence related outcomes, such as resilience, socialisation, mobility, use of assistive technology and life skills; and end of school outcomes (NCSE, 2014).

A collaborative partnership between stakeholders that include disability groups, community groups, educators from schools and further education, and managers from government departments would inform a broader focus for outcomes measurements.

Inclusive Further and Higher Education: A focus on the student and the educational institution

The National Access Plan states that its overall vision is to “ensure that the student body entering, participating in, and completing higher education at all levels reflects the diversity and social mix of Ireland’s population.” There is also the requirement to consider how the education system needs to change to adapt to the needs, interests and goals of diverse groups.

Active participation is central to inclusion and is particularly important for the personal development for individuals in challenging circumstances. Inclusivity requires that all learning and all learners are valued and their achievements celebrated. Learning occurs in a planned, shared environment where goals are set collaboratively reflecting the individual’s capacity and interests to enhance their participation and quality of life. Education in inclusive settings enhances diversity in the school and community. It builds social capital.

Applying a framework to the Discussion

It may be useful to establish a framework within which access to higher and further education can be explored further. This framework would benefit from a focus on the following aspects:

- 1. Person-Centred- Student voice as central to decision making**
- 2. The Environment- Further and Higher Education**
- 3. The Experience- Meaningful engagement as ‘student’ and ‘learner’.**

This would allow for the exploration of key influencing factors such as identifying a need for further support; adjustment in personal skills; adaptation to the demands of the role and tasks of being a student; and the removal of barriers to participation. Each area is detailed below in relation to these considerations and key focus areas for the National Access Plan.

1. “Person-Centred”: Key components to consider in relation to the ‘person’ include; student voice as central to decision making that identifies interests; values; self-view; standards and expectations; motivation; skills and strengths; history of success as a learner, and availability

and use of a network of supports. These would support the development of a **personal future plan**. Positive personal future planning should commence in middle childhood and early adolescence for all students and continue throughout students' third level experience.

Key focus areas for the National Access Plan around supporting this could include:

- Incorporating a focus on each student's personal development, decision making, goal setting, and active planning for his or her own activities in schools, after-school clubs, participation in day programmes, and summer camps
- Career exploration and guidance: The participation of all students in an active Transition Year programme, including a work placement experience that requires collaboration with other agencies and groups external to school settings. Resources to support students in underrepresented groups is lacking. Disability agencies and voluntary groups could make a contribution if facilitated and resourced to do so.
- Structured work experiences and summer placements for students from the targeted groups within further and higher education to widen their experiences and participation, further their personal development, and promote possibilities of a future involving better access to training, education and employment.
- Advocacy training (including self-advocacy) for students and those with a supportive role in a student's life (e.g. peers, parents, teachers, youth groups, sports clubs).

2. **"The Environment"-Further and higher education:** Key components to consider in relation to the 'further and higher education environment' include; physical settings; mission; social and cultural ethos; including how and, to whom, they market themselves; who they include and currently exclude in this space; procedural and administrative processes and regulations, and the outcome measurements they and their funders require. Examination of these components will identify the barriers and enable the creation of supports to enhance participation in an environment where individuals from underrepresented groups, who currently experience difficulties in accessing further and higher education, achieve greater equity of access.

Key focus areas for the National Access Plan around the further and higher education environment could include:

- the voice of students with disabilities who have experienced being part of the further and higher education environment
- Further and higher education institutions:

- Supporting disability groups, disability services, schools, educators and members of the underrepresented groups to build up a data base on the various educational settings with reference to their own information needs.
- Having a physical presence in schools, communities with disabled individuals, and with employment placements to develop person-to-person engagement.
- Including service learning, or Civic Engagement as part of their course requirements, as it is emancipatory and builds social capital. Trinity Centre for People with Intellectual Disabilities are an example of an institution who are doing this.
- Involving their students in activities that allow for opportunities for underrepresented groups and communities, especially in their schools, youth clubs, mental health support groups and disability groups to collaborate on activities with shared aims.
- Developing a felt presence in the local environments of the communities and groups of focus. The knowledge within the communities and groups should be brought to the fore, their history illuminated and shared with the wider society.

3. **“The Experience”-Meaningful engagement in being a ‘student’ and ‘learner:** Key components to consider in relation to the Experience that captures **meaningful engagement in being a ‘student’ and ‘learner’** that includes: the self-management and organisational skill demands of being a student; the new social and physical environment; course expectations and workload (directed and self-directed) and the outcomes required.

Key focus areas for the National Access Plan around Experience-meaningful engagement in being a ‘student’ and ‘learner’ could include:

- Tailor admission requirements to outcomes required for the individual.
- Build social capital through engagement with local communities, employers, disability groups, schools, youth groups etc. to provide holistic and enriching learning experiences including supported work experience.
- Looking at meaningful life and educational outcomes for individuals (as discussed in paragraph above).
- Support and develop the work of student services in supporting those students who have succeeded in entering further and higher education as being particularly valuable for the transition in, through and post higher education.

Conclusion

Developing inclusive education is effortful, multidimensional, and challenging. Collaboration is essential. Schools, individuals, voluntary groups, further and higher education settings all have key roles in delivering on a vision of equity of access to further, higher education and all adult educational settings for all students with disabilities.

The Plan needs to focus on further and higher education options, and to develop more inclusive definitions of further and higher education, as well as re-assess categories of disability to encompass and represent the broad spectrum of disabilities in our community. Interrogating the National Access Plan within the context of the the social model of disability perspective, and utilising a framework that focussed on the key tenets of 'student', 'the further and higher education environment', and 'meaningful engagement in being a 'student', will support the development of structures, policies, and supports to enable the inclusion of a diversity of learners.

Developing a positive personal future plan for active engagement in education and community settings should be a consistent requirement by all support agencies engaging and supporting individuals with disabilities. With a focus towards self-directed personal development goals, positive personal profiles and skills will be developed to support individuals to reach a greater level of independence and participation in society. Funding allocation for supports should prioritise this as a necessary requirement.

The National Access Plan needs would benefit from ongoing engagement with stakeholders (e.g. disability groups, policy, schools, parents, students, educational institutions etc.) at different time points (pre-transition; transitioning, while attending, transitioning from) to capture the longitudinal experiences of individuals as they progress. Furthermore, capturing the longer term outcomes to increase the participation of individuals is required. Outcomes should include measurement of the impacts of policy on the lived experiences of target individuals and groups.

This will support an informed vision for this plan that embodies an inclusive approach.

Submission 3.6 NCGE

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

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

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

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

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

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

Higher Education in Ireland should be accessible to all who wish to enter into HE, whether directly from post primary school or as an adult (i.e. all those over the age of 18 years) returning to education, as undergraduate or returning to HE to complete post-graduate level. Impartial accessible information and guidance should be available to all across the lifespan to support them to consider their options for attending HE.

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

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

Guidance

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

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

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

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

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

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

The current practice of funding for guidance services is based on the model of DE funding guidance in schools, SOLAS funding guidance in FET, with HEA funding access programmes and careers services through the student support programme. These guidance services do not formally connect, co-ordinate or make cross referrals. The development of the National Guidance Strategy would address the co-ordination and delivery of considered and cohesive guidance services to support access to FET and HE programmes, as often it is through progression from FET that learners will access HE.

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

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

In recognition that “teachers have a critical role to play in raising academic aspirations” (HEA 2015, p.17), the NCGE echo a call by the OECD (Musset and Kureková Mýtina 2018) that career guidance should be included within Initial Teacher Education and ongoing Professional Development amongst school staff to embed careers education in the curriculum and nurture an awareness of post-secondary school pathways from an early age. These points were also emphasised in a recent webinar (OECD 2021) delivered by policy analysts of the OECD and are supported by evidence-based research (Covacevich et al. 2021). According to Covacevich et al. (2021, p. 59), “effective counsellors will encourage and enable students to engage in multiple and continuing discussions about their career interests and how they relate to their educational experiences”.

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

Currently the allocation of guidance hours in schools remains lower than the pre-2012 ex-quota guidance position based on student enrolment . A minimum ratio of 22 hours for guidance for 500 students should be considered as the autonomy afforded to management since 2012 has meant that when resources are tight, hours for guidance have been diverted to other school causes, giving rise to inequitable provision (McCoy et al. 2014; Smyth et al. 2015). Smyth et al. 2015, in reports published by the ESRI, have proposed that reinstating the ex-quota model of guidance will help address the inequitable provision of guidance nationally.

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

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

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

Target Groups

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

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

Pathways and Transitions

Processes for application to HE need to be clear, unambiguous and transparent. Where there are clear procedures for applications directly from the school system, the development of pathways from FET to HE should be nationally agreed systems, making use of QQI structures. Locally developed progression options between FET centres and HE institutions do not benefit all FET students nationally. HE should consider that applications from FET learners should include an increased quota of places to ensure progression opportunities, in particular for those “disadvantaged” adult learners who have returned to education through the FET system and are more prepared for progression options into HE programmes at NFQ Levels 7 and 8.

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

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

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

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

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

Funding and Social Protection

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

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

Implications from Covid pandemic

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

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

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

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

Social Inclusion

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

Education for Sustainable Development

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

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

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

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

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

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

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

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

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

Graphic Illustration

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

In summary

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

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

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

Submission 3.7 QQI

QQI welcomes this opportunity to contribute to the consultation on the development of the fourth National Access Plan, providing for equity of access measures to higher education. The successful growth in increased participation across the Framework, including by communities, families and individuals who would not previously or typically have enjoyed opportunities associated with higher education without the work of successive National Access Plans, communities of practice, policy and the breadth of stakeholders is acknowledged at the outset.

QQI is finalising a fourth Statement of Strategy which outlines how we will contribute to shaping Ireland as an island of innovation, talent, international leadership, inclusion and engagement, fully aligned to the ambitions of the Department of Further and Higher Education, Research, Innovation and Science. QQI will collaborate to meet the challenges faced nationally over the period of the next Access Plan, including through supporting the development of an integrated approach to the diversity of quality and qualifications across a dynamic tertiary education and training system - including further and higher, education and training, public and private stakeholders.

Towards a nationally coherent approach to access, transfer and progression

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

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

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

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

Pathways and Diversity

An inclusive higher education system is one which can equitably accommodate multiple cohorts of learners who will have achieved a diversity of awards, both as types and as qualifications. QQI aims to enable the development of more diverse types of qualifications (including micro-credentials) in the NFQ which will give learning achievement widespread recognition including by employers and potentially open increasingly diverse access pathways to higher education. Apprenticeships also provide pathways through FET-HE. The challenge of access, efficiency, permeability and scarcity is discussed in the Green Paper on Qualifications, underlining the necessity of appropriate pathways for diverse learners.

Recent developments in practices in work integrated learning across all sectors, related validation of prior experiential learning and reflections on the learning from the Study of Mature Student Participation in Higher Education in relation to barriers and enablers for participation in the context of economic upturn and downturn, suggest that access policies and practices need to give greater consideration to workplaces as sites of learning. Potentially this delivers all three of the identified support structures identified in the Study of Mature Student Participation in Higher Education, in-reach, out-reach and flexibility⁴ for a diverse learner cohort. Structured engagement with employers, sectoral bodies and social partners has the capacity to support greater inclusion and diversification and ultimately a universal design approach not just to teaching and learning, but to access itself.

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

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

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

QQI as an awarding body

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

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

Data infrastructure

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

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

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

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

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

A culture of research and evaluation into access and participation

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

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

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

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

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

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

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

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

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

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

[Submission 3.8 NDA](#)

Introduction

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

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

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

Data and statistics

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

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

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

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

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

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

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

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

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

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

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

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

NDA recommendations for the new National Access Plan

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

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

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

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

Include Universal Design (UD) and Universal Design for Learning (UDL) as the core methodologies that underpin the design and delivery of higher education to the benefit of all learners, including persons with disabilities, as well as people whose first language is not English, have low literacy levels, older / younger people and people of a wide range of abilities. The Centre for Excellence in Universal design (CEUD) promotes UD and UDL as a benefit for all rather than an additional cost to support “the few”.

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

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

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

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

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

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

Appendix One

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

UN Convention on the Rights of Persons with Disabilities

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

The National Disability Inclusion Strategy

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

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

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

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

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

Compliance with Part M 2010 of the Building Regulations

Taking a proactive approach to improving the accessibility of public buildings, including educational buildings, in the ownership, management or control of public bodies, is a requirement under Section 25 of the Disability Act, which states that ‘a public body shall ensure that its public buildings, are as far as practicable, accessible to persons with disabilities’. Section 25 requires the upgrading of older public buildings so that they comply with Part M of the Building Regulations. Under Section 25, public bodies are required to bring their public buildings into compliance with Part M 2010 by 1st January 2022.5

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

Compliance with Part 5 of the Disability Act 2005

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

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

This Directive was transposed into Irish law on September 23rd 2020 and requires public sector bodies, including higher education institutions, to take necessary measures to ensure their website and mobile applications comply with the Web Content Accessibility Guidelines. The Directive also requires that public bodies publish and maintain an Accessibility Statement that provides detailed information on the accessibility their websites, steps taken to ensure compliance and contact details for website users to report issues and request assistance. The NDA advice that the HEA reviews its website, produce an accessibility statement and takes steps to ensure it meets the necessary requirements. The scope of the Directive also covers Learning Management Systems and their content. The NDA will be the official monitoring body for this Directive and Regulations and is due to submit its first report in this regard to the Department of Communications, Climate Change and Environment by 23rd December 2021.

Disability Awareness Training

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

Irish Sign Language Act

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