



**Disability Federation of Ireland
Submission on National Access Plan
2022-2026**

June 2021

Introduction

The ratification of the UN Convention on the Rights of Persons with Disabilities in 2018 means that every government Department has a role to play in implementation. Article 24 of the UN CRPD recognises the equal right of persons with disabilities to education, and the obligation to ensure an inclusive education system at all levels. The National Plan for Equity of Access to Higher Education is one means of achieving this in higher education.

The National Disability Authority estimate that by 2026, the number of people with disabilities will have increased by 20% due to demographic factors.¹ It is essential that the National Access Plan plans for these demographic changes.

Addressing Educational Inequities

People with disabilities access further and higher education at a lower rate than people without disabilities. Census 2016 shows that:

- Of people with disabilities aged 15 to 50, 13.7% had completed no higher than primary level compared to 4.2% of the general population.
- 37% of people with disabilities aged 15 to 50 had completed third level education compared to 53.4% of the general population.

The Progress Review of the National Access Plan (2018) revealed that the participation of students with disabilities (as a % of all new entrants to higher education) had increased from a baseline of 6% to 10%, exceeding the target of 8%. This is testament to the work of the Higher Education Authority, higher education institutions and other key stakeholders. There is still progress to be made however, and a more ambitious target is clearly warranted.

Research by AHEAD shows that in the last ten years the number of students with sensory disabilities has grown by less than half the rate of students with disabilities generally, so there is a need to focus on the barriers facing this cohort of students with disabilities in particular. Students with intellectual disability are also comparatively underrepresented in higher education. Work is needed to ensure that the specific barriers facing these cohorts of students with disabilities are

¹ Census 2016 and NDA (2018), Disability Statistics.

addressed. Expanding the National Plan for Equity of Access to Higher Education, and formalising Higher Education Access Route programmes across all institutions as committed to in the Programme for Government would go some way towards addressing this.

There is also a need for the next National Access Plan to place greater focus on the experiences and success of students in higher education. Once students with disabilities enter higher education, the supports need to be in place to give students the best chance possible to succeed and thrive. This should be an area of focus in the next National Access Plan.

Cross-Departmental Working

The National Access Plan will need to build in a strong cross-departmental element to resolve the challenges facing people with disabilities in accessing higher education. Its implementation will require working closely with other government Departments, and this should be explicit in the plan.

For example, the experience of students with disabilities in secondary and indeed primary education will likely have a significant impact on whether they enter higher education. Working closely with the Department of Education will therefore be necessary to ensure the appropriate supports for students with disabilities are in place in school. For example, there are approximately 340 special schools with no access to career guidance counsellors. This likely impacts on whether the students in those schools consider options like higher education. The Department of Children, Equality, Disability Integration and Youth (DCEDIY) should also be built in, given this Department's remit in relation to disability.

Points of transition are often a particularly challenging time in the lives of people with disabilities as services and supports are not delivered in a joined-up way. Transitioning from secondary education to further/higher education to employment means having to reapply for the same supports. To address this, your Department will need to work closely with other Departments like the Department of Education, the Department of Social Protection, and the Department of Enterprise, Trade and Employment.

A lack of accessible transport and accessible accommodation are other areas that can hamper the ability of people with disabilities to attend further and higher institutions, particularly when they are not in the immediate locality. Resolving these issues will involve engaging with the Department of Transport and the Department of Housing, Local Government and Heritage.

Collaboration with the Department of Health is also important due to their funding of the core disability services programmes, and the continued role they will have over supports like primary care, mental health services etc. when the disability services programme transitions to DCEDIY.

This Department can also work closely with other Departments to address issues such as the unemployment of people with disabilities. Ireland has the lowest employment rate for people with disabilities in the EU, almost 20% lower than the EU average of 50.8%.² Higher education is a means to addressing this, and the Department should work with the Department of Enterprise, Trade and Employment and Department of Social Protection to ensure that there are employment opportunities for people with disabilities upon graduating.

Universal Design for Learning

The National Access Plan should promote the principles of universal design for learning in further and higher education. Universal Design for Learning (UDL) is a set of principles and guidelines that use a variety of teaching methods in order to lower barriers to learning and give all learners equal opportunities to succeed. Universal design would benefit all of the target groups in the plan, including people with disabilities.

UDL is already embedded in the policies, guidelines and strategies of many national bodies- including this Department, the Department of Education, SOLAS, Quality and Qualifications Ireland and the Centre for Excellence in Universal Design. This Department can play a leading role in promoting education that is inclusive for all learners, including through placing it at the centre of the National Access Plan.

UDL encompasses areas such as presenting content in multiple formats, providing multiple assessment options and investment in closed captioning, audio-visual supports, Irish Sign Language interpreters etc. so that these are provided as a matter of course rather than in exceptional circumstances. Support for further and higher education institutions to make their physical environments more accessible and build flexible learning spaces for UDL approaches of teaching should be provided via a programme of capital works.

² CSO, SILC (2018) op cit, EDF (2020) p.18-19.

Disability and Poverty

There is a strong correlation between disability and poverty. Poverty rates for people with disabilities are 10% higher than the EU average, with Ireland ranking among the worst five countries in the EU.³ There is a higher prevalence of students with disabilities in DEIS schools than other non-DEIS school across the country, primarily due to the fact that people with disabilities are approximately twice as likely to suffer from poverty or social exclusion than the rest of the population (Smyth, 2018; Eurostat, 2018).

Higher education is a means of addressing this poverty, however in order to do so, financial barriers to engaging in education need to be overcome. These include the additional costs that many students with disabilities face accessing education such as specialist transport, equipment, assistive technology etc.

We welcome the full review of the SUSI student grant scheme, and see this as a necessary complement to the National Access Plan. DFI and AHEAD made a joint submission to this review which contains many measures that would improve the SUSI grant for students with disabilities.

Programmes like PATH 2 which specifically target students with disabilities who are also economically disadvantaged are also of great importance. It is important that students with disabilities from all socio-economic backgrounds are adequately supported to access and succeed in higher education.

Intersectionality

Disability intersects with many other forms of disadvantage. The National Access Plan should not look at each target group in isolation, as many people will belong to more than one of the target groups. Disability should therefore be considered in relation to efforts to increase participation by all of the other target groups. As the previous section has noted, there is huge intersection between the target groups of people with disabilities and people disadvantaged by socio-economic barriers.

First-time mature students

³ CSO, SILC (2018) op cit, EDF (2020) p.18-19.

First-time mature students were a target group in the previous National Access Plan. Mature students with disabilities should be considered in efforts to increase mature student participation. The statistics on educational participation among people with disabilities aged 15-50 show that many potential mature students with disabilities will have lower levels of education than the general population. As 13.7% of people with disabilities aged 15-50 have completed no higher than primary education for example, there will be a need to ensure accessible further and community education options are available, and that there are strong links from these into higher education. For adults who acquire a disability at working age, higher education as mature students could be a valuable way of learning, up-skilling and rebuilding confidence.

Part-time and flexible learners

The target of increasing participation in part-time/flexible higher education in the last National Access Plan also has great relevance for people with disabilities. In many cases, this may well be a more accessible option for people with disabilities for whom full time attendance would be challenging due to their disability e.g. due to co-morbid health conditions that would inhibit full time attendance, mental health issues etc. This is an option that should be promoted to people with disabilities, however the necessary supports (including disability-specific supports and financial supports) need to be in place to ensure it is a viable choice. For example, the Fund for Students with Disabilities should be extended to all students in further education. Currently, it is only available to full time students in level 5/6 PLC programmes. DFI also support the appointment of disability experts at ETB level.

Progression from further education

The target of progression to higher education by holders of further education qualifications is of significant relevance to people with disabilities. Attending further education as a first step and then transitioning on to higher education may be a more accessible, less daunting option for some people with disabilities. For example, for someone who has recently acquired a disability or transitioning from a special school or class this may be a more attractive option. However, to ensure that these students remain in education, the necessary supports need to be in place in further education. The National Access Plan therefore need to build in collaboration between relevant agencies including the HEA, SOLAS, higher education institutions, ETBs etc.

Irish Travellers with disabilities

Participation in higher education by Irish Travellers was a target in the last National Access Plan. There is evidence to suggest a higher rate of disability among Travellers due to health inequalities and disadvantage. Both people with disabilities and Travellers are more likely to experience poverty, so disabled Travellers are likely to be disadvantaged in multiple senses. The next National Action Plan should consider this.

Immigrants with disabilities

While not a target group in the last National Access Plan, the needs of refugees, asylum seekers and immigrants with disabilities, including those in Direct Provision should be considered.

Disability crosses all other sections of society and is relevant to all of the other target groups in the National Access Plan. The National Access Plan should consider how different forms of disadvantage intersect, and how the different target groups relate to one another. Actions that address the needs of each target group in isolation will be less effective than actions that address the needs of multiple target groups in a coherent and holistic way. Programmes like PATH that have recognised this have seen great success and initiatives like this should continue to be supported and promoted.

Digital and Assistive Technology

Assistive technology is an important educational support for people with disabilities. The Fund for Students with Disabilities is one means of accessing assistive technology. However, a barrier to accessing education for people with disabilities can be an inconsistent approach and need to repeatedly reapply for the same supports, with no guarantee of success. DFI have long advocated for an assistive technology passport that would follow the person through life. At €1.5million, the cost is relatively modest and would make a huge difference to the ability of people with disabilities to live independently and engage in education and employment. The challenge thus far has been the collaboration which is required between multiple Departments to deliver this.

Funding higher education institutions to conduct digital accessibility audits, and to carry out recommended works as part of the National Access Plan. This should include funding for training teachers to create accessible learning materials. As COVID-19 has led to a far stronger reliance on remote and digital learning, this would be a particularly timely

intervention. It would also support institutions to implement the EU Web Accessibility Directive recently transposed into Irish Law.

Access to digital equipment is important for students with disabilities, with the Fund for Students with Disabilities one means to address this. However, an underlooked and important aspect is access to training on how to use digital equipment and access online content and webinars.

Addressing digital poverty and the affordability of broadband and necessary devices is also important, particularly given the higher poverty rates of people with disabilities. COVID-19 has particularly highlighted the importance of addressing digital poverty as many higher education courses moved online.

Conclusion

Improving students with disabilities opportunities to access and succeed in higher education should be a central element of the next National Access Plan. This would contribute to Ireland meeting its obligations under the UN CRPD. Given the success so far in meeting the targets of the last National Access Plan in relation to students with disabilities, more ambitious targets should now be adopted. Focusing on ensuring that the appropriate disability and financial supports are in place, and working closely with other relevant government Departments would help increase the numbers of students with disabilities in higher education. Universal design and digital and assistive technology are both important areas of focus. Measures that address disability alongside other forms of disadvantage, including poverty is of great importance. The National Access Plan should recognise these intersections between different target groups.



DFI is about making Ireland fairer for people with disabilities.

We work to create an Ireland where everyone can thrive, where everyone is equally valued.

We do this by supporting people with disabilities and strengthening the disability movement.

There are over 120 member organisations in DFI. We also work with a growing number of other organisations that have a significant interest in people with disabilities.

DFI provides:

- Information
- Training and Support
- Networking
- Advocacy and Representation
- Research, Policy Development and Implementation
- Organisation and Management Development

Disability is a societal issue and DFI works with Government, and across all the social and economic strands and interests of society.

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