



Union of Students in Ireland
Aontas na Mac Léinn in Éirinn

Written submission to the Joint Committee on the eligibility criteria, application procedures and appeals process of the SUSI grant

About USI

The Union of Students in Ireland (USI) is the sole representative body for students in Ireland and represents 354,000 students in over thirty member colleges across Ireland, North and South. Throughout its history, USI has worked relentlessly in the pursuit of student rights in all areas of the student experience. The goal of USI is to work for the rights of students and a fair and equal third-level education system in Ireland.

USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries, and a member of Eurodoc, the European Council for Doctoral Candidates and Junior Researchers.

Introduction

Equity of access to higher education is a core component of the work USI. We recognise and appreciate that the SUSI grant supports many students through college, however, we believe there are areas for improvement.

Many Students' Union officers throughout the year see students daily which often have financial distress and the SUSI grant is very regularly discussed amongst peers. Every year USI promotes the SUSI grant to students and deliver a training module on SUSI to prepare them to support students who are experiencing difficulty in relation to SUSI

USI and SUSI have a positive relationship, the helpline has been very well received from Students' Union officer around the country and USI welcome this resource. We wish to applaud the work undertaken by SUSI to improve the system since its establishment in 2012 and we hope to see further improvements in line with the issues highlighted below.

Many of our concerns relate to the eligibility criteria, we have detailed them below. USI strongly believes swift action needs to be result from this review process to ensure that

those students who currently fail to meet one or more of the criteria but are in need of financial support, can receive an award and enter or progress through higher education.

We welcome this review however, we believe there is a wider issue in terms of budget decisions that have had vastly negative impact on students and their families such as the adjacency rates and cuts to the levels of awards for both undergraduate and postgraduate students. USI have been lobbying for the reversal of many decisions taken in 2011 which are laid out in our Pre-Budget Submission.

Eligibility Criteria

Our position, based on discussions with Students' Union Officer¹, and our policies which has been passed through our Annual Congress, is that there are a number of areas within the eligibility criteria for SUSI that can be reformed. These include class of applicant, residency, approved institutions, holiday earnings and special rate criteria.

The class of applicant criteria is one that has proven difficult for many students when applying for the SUSI grant. The process to determine the class of applicant is extremely rigid and requires more flexibility. In the current SUSI system, students who are legal adults (18+ years) and support themselves through college, cannot be assessed as independent adults, unless they are mature students or have proof of estrangement which can be very difficult to retain. This omits a large category of students who are not dependent on their parents between the ages of 18-23. On top of this, students are required to inform SUSI of change in circumstances but this does not allow for a transition to financially independent living. Additional flexibility in this process would also benefit applicants under 23 who are parents as they are currently assessed as dependent applicants. There is a strong need for flexibility by students in third level.

USI strongly believes that anyone over the age of 18 should be eligible to be assessed as 'Independent' if they can satisfy the same criteria as those aged 23, and that applicants should be able to transition between being classified as a 'Dependent' and an 'Independent'. Finally, USI recommends SUSI allows for flexibility in certain cases as not every application can fit the criteria as comfortably as others.

SUSI currently requires students to prove residency with accommodation registered to the Residential Tenancies Board (RTB). USI has become aware of the many issues of students being denied grants due to their privately rented accommodation not being registered with the Residential Tenancies Board (RTB). The Residential Tenancies Board (RTB) is a public body set up to support and develop a well-functioning rental housing sector and they maintain a national registry of tenancies.

¹ There have been two discussions held during a Working Group, a sub-group of USI's National Council, largely made up of Welfare and Education Officers. There are approximately 35-40 active members in this group, all elected full-time Officers, working to support students on welfare and education related matters, and on policy issues in their colleges

Students applying to SUSI as an Independent applicant must provide SUSI with proof of address in the form of a bill, or letter from the RTB proving their residency. With a student accommodation and housing crisis across Ireland, students have no other choice than to rent accommodation that may not provide them with these documents. This is directly affecting students applying for a grant under the 'Independent' category and leaves many having to reapply under the 'Dependent' category and/or making them ineligible for a grant in either case. In other cases, students are going to the SUSI appeals board stage and being successful after months of financial strain of being without grant support. It is very difficult to prove independence for students who are staying in digs style accommodation or subletting as they have no bills with their name or proof and letters from landlords aren't accepted. USI believes this is extremely restrictive and should be reviewed with urgency to allow students to provide other forms of evidence in order to allow earlier access to grant.

USI believes the criteria to be resident in Ireland for 3 out of the last 5 years should be reduced to 2 of the last 5 years. Students who have not lived in Ireland or another EU member state for 3 of the last 5 years do not qualify for EU tuition fee levels or the student maintenance grant, regardless of their nationality and/or citizenship. This policy has particularly affected the many young people who emigrated from Ireland during the economic crisis and are now returning. This criterion creates a disincentive for migrants wanting to return to Ireland by imposing an excessive financial burden to their access to higher level education in Ireland. USI believes that all Irish Citizens & those with residence status should qualify for the EU tuition fee levels regardless of their number of years resident in the country and if they meet all other criteria, should be eligible to receive a maintenance grant. USI welcome that refugees have now access to the SUSI grant system however, this residency criteria also directly affects refugees who have entered Ireland seeking asylum. The residency criteria coupled with the poor financial supports for those living in direct provision, makes accessing higher education extremely difficult and therefore USI recommends that refugees and those living in direct provision should be omitted from the residency criteria.

USI believes the current criteria based on approved third-level institutions is a barrier to those trying to attend some third-level institutions and that grants should be made available to students based on each individual circumstance on meeting the other required criteria rather than on what education institution they attend. There are currently nine institutions listed on the SUSI website not eligible for funding although they are offered through the CAO.

USI believes the Government needs to commit to part-time students receiving the same supports that would be available to full-time students in similar circumstances. According to the HEA Eurostat Survey (2016)², 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 students. It is unfair to punish students who are trying to further themselves through studying but due to circumstance cannot commit to attend a higher

² Eurostudent VI study conducted by Insight Statistical Consulting on behalf of the Higher Education Authority. Available at: <https://hea.ie/assets/uploads/2018/01/HEA-Eurostudent-Survey.pdf>

education institution in a full-time capacity. The SUSI grant system must be expanded to include these students.

There is no eligibility process or maintenance grant for students who must do unpaid placements as part of their course. SUSI pays for field trips, the grant should be extended to include placements on the criteria.

The current SUSI criteria allow Holiday Earnings of up to €4,500 earned outside term time for an applicant who was in education and also employed during the previous year to be deducted from their income. The period of time that this includes is 2 weeks at Christmas, 2 weeks at Easter and 12 weeks during the summer during June to August, only. USI believes this is too restrictive considering many students need to work during term time to meet the current cost attending education³ and that this restriction should be removed and the earning allowance increased.

Many of the most vulnerable in higher education are mature students and those who have a disability or an illness. Upon entry to higher education, especially surrounding carers allowances, jobseekers allowance, and / or disability may be forced to change to BTEA payment to keep entitlements such as HAP or rent supplement and other social welfare scheme and supports. Those in receipt of the BTEA payments are not then entitled to receive maintenance part of the susi which can act as a barrier to widening participation in higher education.

SUSI has criteria around not being eligible for SUSI until five years after previous degree. USI don't believe that previous education is relevant and if students complete a degree they should be allowed to return. USI ask for this criteria to be removed from the SUSI grant system so that students can return to college and be eligible for SUSI.

Eligibility Criteria Recommendations

- Urgent review of procedures for proof of independent status, recognising that many students cannot provide the necessary evidence.
- That SUSI allows for flexibility in certain cases as not every application can fit the criteria as comfortably as others.
- Urgent review of procedures for proof of residency, to allow students to provide other forms of evidence in order to allow earlier access to grant.
- That refugees and those living in direct provision should be omitted from the residency criteria.
- Grants to be available to the nine institutions currently listed on the SUSI website that aren't eligible for the SUSI grant.
- USI believes the criteria to be resident in Ireland for 3 out of the last 5 years should be reduced to 2 of the last 5 years.
- The SUSI grant system must be expanded to include part time students and placements.

³ DIT Campus Life Cost of Living Guide 2018. Available at:
<https://www.dit.ie/campuslife/studentsupport/costoflivingguide/>

- A SUSI maintenance grant for students who must do unpaid placements as part of their course.
- Holidays earnings allowance should be increased, considering many students need to work during term time to meet the current cost attending education.
- Previous education is relevant and the time criteria to be removed from the SUSI grant system so students can return to college and be eligible for SUSI.
- Those in receipt of the BTEA payments should receive maintenance grant from SUSI to widen participation in higher education.

The application procedure

USI applaud the work of SUSI and has been a big improvement in the application procedure for the SUSI grant scheme. The videos online are a huge help to students that are unclear about the process.

There is lack of clarity / miscommunication between SUSI and students in relation to who is to contact the college to confirm that the student is registered, and if the student needs the SUSI grant to register. This can be a very isolating experience for some of our students.

At times there is confusion over the types of supporting documentation that's needed in the application. USI recommends that examples of the type of supporting documents that are required in the application, are made available to students to see on the website to make it as user friendly as possible for guardians/students. More graphics used on the SUSI.ie website and an update on communications policy / strategy and regular quality assurance on training / customer service.

The application procedure recommendations

- Show examples of supporting documentation to students
- Use more informative graphics on website
- Review of the communication policy / strategy
- Regular quality assurance on staff training / customer service

Appeals process

Exceptional circumstances options is not always made clear to students. Something I've heard consistently from students is how inflexible SUSI can be in relation to changes in circumstances.

If a Mature applicant was living independently but had to move home due to a job loss or bereavement etc, then they shouldn't have their parents income taken into account if applying for a grant the following year or there should allowance for that situation.

USI recommends that exceptional circumstances should be made clear to SUSI applications during the application process

Appeals Process recommendations

- Flexibility of change in circumstances
- Exception circumstances procedure highlight top SUSI applicants

Conclusion

The Union of Students in Ireland welcomes the review to the eligibility, application and appeal process. We believe this sets the agenda in terms of reforms to ensure students who are in need of financial support can receive such support to further their education. However, the issues around funding still remains a big piece of the puzzle for improving the SUSI grant scheme.

Increasing the threshold and allocation given through the Student Universal Support Ireland (SUSI) grant scheme. The DIT Campus Life survey (2018)⁴ details that on average the total cost to attend third level education in Dublin is €11,829 per annum. While USI welcomes extending and increasing eligibility for grants in recent years – especially in Budget 2017 towards postgraduates, unfortunately these measures don't go far enough.

USI strongly urges the Government to reverse the decision taken in Budget 2011 and decrease the qualifying distance for the non-adjacent rate from 45km to 24km. The current qualifying distance of 45km intends to consider a reasonable distance which students may commute daily. However, this puts many students at a disadvantage - especially those from outside major urban areas for various reasons. Some rural public transport links are poor to the point that students miss early or late lectures. This has a huge impact on the student experience and educational experience students receive as they are forced to either miss lectures, commute long distances or work part time jobs to pay for rent. By way of example, Birr Co. Offaly, population 5,741 is 40km from the nearest third level institution, Athlone Institute of Technology (AIT). The earliest a student can arrive in AIT using by direct bus is 1.25pm. This means that students are missing lectures, which is a negative impact on their education. The adjacent grant exists to provide maintenance for those who are capable of commuting and provides for students, the cost of travel may be comparable to a living cost in the college town, defeating the purpose of this rate.

USI strongly recommends that the Department of Education and Skills and the Department of Public Expenditure and Reform to restore the grant adjacency rates to the pre-Budget 2011 rate of 24km and A rural exemption or decrease in rate for rural colleges with poor transport links.

The Union of Students in Ireland is committed to representing students across the Island to ensure they are fully supported throughout their education. We believe the improvements in the SUSI system have been vast in terms of the application and appeals procedures but that there are solutions needed to solve the issues relating to the eligibility criteria that have a negative impact on students.

Concluding recommendations

⁴ DIT Campus Life Cost of Living Guide 2018. Available at: <https://www.dit.ie/campuslife/studentssupport/costoflivingguide/>

- Increase the threshold and allocation given through the Student Universal Support Ireland (SUSI) grant scheme.
- Reform to restore the grant adjacency rates to the pre-Budget 2011 rate of 24km
- A rural exemption or decrease in rate for rural colleges with poor transport links.

If you have any questions about this submission you can contact the President of USI, Lorna Fitzpatrick (president@usi.ie / - 087 276 3941) or Roisin O'Donovan, Vice President for Welfare(welfare@usi.ie / 087 2809 703)