



**Submission to Department of Further & Higher Education, Research, Innovation & Science
Public Consultation on Statement of Strategy 2021 - 2023**

Introduction

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level Students' Unions in Ireland. Founded in 1959, USI now represents more than 374,000 students in over thirty colleges across the island of Ireland. 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.

USI Response to Strategy Consultation

The creation of the Department of Further and Higher Education, Research, Innovation & Science has so far proven to be an important development for the sector. The Department and the Minister have continuously spoken about the clear need for partnership, which USI welcomes but this needs to be followed by clear and concrete actions. USI welcomes the opportunity to feed into the development of this strategy.

The Department has asked specific questions in relation to policy development and focus however, as the Department has only formed quite recently, its' full scope and focus is yet to become clear. The initial emphasis articulated by the Minister on engagement with students, partnership and addressing the funding crisis within third level has been welcomed.

Transformational Vision for Accessing Further and Higher Education

The current National Strategy for Higher Education to 2030, which was published in 2011, outlines the vision for Higher Education. However, the landscape for Higher Education has changed dramatically since this report was first published. COVID-19 has progressed changes that would have otherwise taken a decade to achieve however, there is a need to review these developments, in partnership with students, to identify any negative impacts but also to concrete positive developments. Additionally, many of these developments will

require additional structural and policy changes such as student representation for online courses. USI believes it is essential to conduct a review of this Strategy to ensure the goals for Higher Education are in line with the current landscape and that the measures are in place to support the sector meet those goals.

USI believes there is a need to fully consider the impact of the Department's funding policies for Higher Education Institutions. It is USI's belief that the current funding strategy has resulted in HEIs operating like businesses rather than accessible and supportive places of learning. This has been shown through the rapidly increasing fees faced by international and postgraduate students and the student contribution charge, which is the highest in the European Union. The current funding model for Universities and the Technological Sector is steeped in inequality, particularly for Technological Universities. This coupled with a move towards competitive funding calls and top-slice funding arrangements has resulted in an extremely complex funding model. USI strongly believes there is a need for policy reform in relation to funding policies to ensure students are not being used to plug a gap caused by a loss and/or change to Government funding policies.

Need for Collaboration Across the Sector in Policy Development

Many Government policies are not always complimentary of one another e.g. The National Access Plan is inhibited by inadequate policy within SUSI – no funding for part-time or online students etc. USI believes there is a need to look at the holistic aims of the Department and how this can be best supported by a range of complimentary policies. It is also important to be led by the experts in the area e.g. giving the National Forum for the Enhancement of Teaching & Learning the space to lead on the development of HE sector priorities/strategies around Teaching & Learning in collaboration with students, sector bodies etc.

USI fears that lack of joint up-thinking leads to duplication of effort, or in some cases, areas being missed entirely. Student input into policy development is not always facilitated until formal consultation – if we're to meet the Minister's ambitions of being 'the Department for Students' then this culture needs to change. The process for policy development must include voices from all key stakeholders, including student and staff representatives.

The recent challenges faced by student nurses & midwives, and other students working in healthcare settings serve to highlight the lack of collaboration taking place across Departments. If the Department is serious about supporting the successful participation of all sections of society in Further & Higher Education, then significant work must be undertaken alongside relevant Departments such as the Department of Housing, Department of Social Protection and Department of Health to support all students throughout their educational journey. Examples of issues that could be addressed interdepartmentally include the financial barriers that unpaid placements pose for students on relevant courses, and the lack of funding available to support students wishing to pursue a Medical career through the Graduate Entry route

Recommendations:

- Review of the National Strategy for Higher Education to 2030
- Funding policy reform
- Collaboration Across the Sector in Policy Development

There are many challenges facing further and higher education in this new decade however many have been reinforced by the COVID-19 pandemic. USI believes particular focus is required to address these, some of which are challenges that have faced the sector for quite some time.

Students at the heart of the Department

The ongoing development of a Strategic Dialogue Process and National Student Partnership Agreement needs to be prioritised and viewed as a means of centring the role of students in development of all DFEHERIS policy.

USI believes that the development of a National Student Partnership Agreement is essential to ensure student leaders across Third-Level Education are supported to represent students across their institution. This agreement will ensure that students have access to a democratic, autonomous and accountable representative body.

USI believes this Agreement can form the basis of further essential development work to improve student engagement across sections of the sector e.g., Apprenticeship Voice, FET Student Engagement, HE Student Engagement & Partnership.

The development of a Framework for Supporting Students' Unions/Student Representation based on the Scottish Model¹ is the beginning of a journey towards legal recognition for students' union bodies. The development of independent and democratic student-led organisations will aid the enhancement of the tertiary sector by acting as 'critical friends' to their institutions and enabling colleges to develop robust quality and governance structures. USI believes this could also facilitate the establishment of more structured student representation in FET and Apprenticeships.

USI is engaged in conversations with FET Colleges Ireland around development of representation structures within the FET Sector. There is a clear want and need for structures which would enhance student voice in democratic representation and quality assurance processes. Government support for this would be welcomed.

Recommendations:

- Prioritising the development of the strategic dialogue and national student partnership agreement.
- Support the further development of democratic representation within the Further Education & Training Sector

¹ Sparqs, 'Framework for the Development of Strong and Effective College Students' Associations in Scotland', 2015. Available at < https://docs.wixstatic.com/ugd/7a7649_d3dbf66a8b114b9cb0ad8dfaa7ec2da4.pdf>, last viewed 18 December 2020.

- Development of a Framework for Supporting Students' Unions/Student Representation with the longer-term goal of legal recognition for Students' Union bodies.

Definition and view of Access

Many of the Department's policies look to support widening participation in further and higher education however, this cannot be fully realised if the current methods of promoting and supporting broader access remain unchanged as they continue to address issues in isolation rather than tackling the systemic barriers facing students.. The need for collaboration during policy development has been outlined above which is one step in achieving this goal however, it is also important to acknowledge the impact of policy decisions on individual's ability to access education e.g., private market development of student accommodation.

COVID-19 highlighted the importance of access routes and as a way of supporting entry to Higher Education for socially disadvantaged groups. Access policy must also aim to support these same students throughout their studies and as they transition out of Higher Education into employment and further study.

The Department must also do more to remove barriers to education for many groups, particularly migrants, asylum seekers, undocumented people and those in Direct Provision who are required to pay non-EU fees. At present, HEIs provide support through Sanctuary scholarships, however scholarships provide access to Higher Education for only a small number of students with varying entry requirements. USI believes there is a greater role for the Department to play in supporting access initiatives into higher education for migrants, asylum seekers, those who are undocumented and those within the Direct Provision system. The Department must also work with the Department of Justice to ensure students attending further and higher education do not receive deportation orders during their studies. Supports must be prioritised for students studying in Ireland and for them to gain employment once they graduate.

USI applauds the different college-based access routes however these programmes must form part of an aligned national strategy to increase participation in Higher Education amongst socially disadvantaged groups, underpinned by effective financial, and practical supports. USI welcomes the recent announcement of the SUSI Review by the Minister, and looks forward to participating in this process. It is also of vital importance that other financial supports, such as Back to Education Allowance are considered as part of this review. Furthermore, the issues of parity of esteem must be addressed such as access to SUSI for students undertaking degrees in other types of institution e.g. FET colleges. Greater collaboration across the FET and HE sector would also be welcomed in order to develop clearer transition routes between both sectors.

Recommendations:

- Long-term supports for students entering through supported access routes.

- Overhaul of financial supports available to students in third-level education including SUSI and Back to Education Allowance.
- Allow migrants, asylum seekers, those who are undocumented and those within the Direct Provision system to qualify for the Free Fees Initiative and be eligible for EU fee rates and increase access supports and routes.
- Work with the Department of Justice to prevent the deportation of students studying in Ireland.

Supporting Irish Language within Education

Access to Education through Irish at third level is significantly lower than at primary or second level. Further investment is needed to provide more courses through Irish at third level, in order to meet the Official Languages Bill's target of 20% proficiency of Irish amongst civil service recruits.

The Department should provide support to HEIs to ensure they are compliant with the Official Languages Act 2003 in the provision of services through Irish to students e.g., writing support centres, counselling services, administration offices. This support will have to be coupled with reporting to ensure compliance.

In relation to the Gaeltacht Grant for student teachers, DFHERIS should take responsibility for the costs associated with student teachers attending mandatory courses in the Gaeltacht as part of their degree. No other cohort of students are required to pay a fee to attend a mandatory placement nor does the Government have to provide a specific grant for them to do so. The responsibility for this payment should not lie with students or the reliance on a Government grant and DFHERIS should liaise with CONCOS and the Teaching Council to discuss how the placement can be funded permanently.

Finally, students undertaking courses taught in English should have the right to undergo assessment through Irish as is the case in Wales².

Recommendations:

- Increase investment in Irish-medium courses at third level.
- Support HEIs in providing services through Irish, in compliance with the Official Languages Act.
- Move away from the Gaeltacht grant model to full Government funding of mandatory Gaeltacht placement for student teachers.
- Support HEIs in allowing students to complete assessment through Irish on English language courses, in line with current practice in Wales.

² "Assessment in Welsh/Another Language, *Swansea University/Prifysgol Abertawe*. Available at < <https://myuni.swansea.ac.uk/academic-life/academic-regulations/assessment-and-progress/assessment-in-welsh-another-language/?fbclid=IwAR0DNfvy8i89BeTS615kdW4TquPTm8BajeYSs2iiPTdVXyDrhg6o1ZvHNqM>>, Last Accessed 18 December 2020.

Postgraduate Rights and Precarious Work

The challenges facing many within the sector including postgraduate students, researchers and postdoctoral students need to be acknowledged and addressed. However, it is important that these are addressed in partnership with student and staff representative bodies alongside sectoral bodies. It is vital that the issues are not viewed or resolved in silos as each can have a knock-on impact on the other.

One immediate step that can be taken is the development of a forum, with all key representatives present to identify the issues and pathways to solutions such as stipend increases and clarity on funding allocations.

Recommendations:

- Develop a consultative forum with sector agencies, representative bodies, students' and trade unions and other key stakeholders to address issues impacting postgraduate students and early career researchers such as stipends and precarious work.

Whole of system approach to well-being

USI believes student wellbeing lies at the core of the college and learning experience. A student's wellbeing can vary throughout the course of the academic term for various reasons, including financial hardship, feeling lonely and isolated, difficulty in making friendships, personal circumstances, underlying mental health or physical health difficulties, challenging course work and any other academic or welfare related struggles. It is therefore essential to make wellbeing initiatives and support services a top priority. A holistic approach to addressing student wellbeing is needed to fully understand the complexity of the matter, allowing us to understand social, emotional, academic, mental, sexual, physical, financial wellbeing.

USI believes the current approach to wellbeing could further be enhanced if a whole of system approach is embedded and built upon through a cross-disciplinary structure. We strongly support and advocate for the Scottish Lancet Model³ to be implemented which encourages an integrated system of student mental health. This model addresses the layers to student mental health and strives to meet the student where they are at in their mental health journey. A cross-disciplinary approach allows for communication between campus wellbeing resources, on campus mental health and disability supports and further off campus mental health services, which significantly enhances the effectiveness of support given to a student at a given time. It is worth noting that a wide range of professional services exist to support student mental health, such as counsellors, psychiatrists, mental health nurses, psychologists, disability support services, student health centres and on

³ <https://usi.ie/mentalhealthreport/>

campus GP's. It has also been identified that peer support, academic advisors, clubs, societies, extra-curricular initiatives support student mental health, through a pro-active preventative manner. USI welcomes the focus placed on supporting student mental health by the Minister and we believe there is scope to further enhance the area of well-being through expanding preventative measures, in addition to funding professional support services.

Covid-19 has brought many additional challenges to student wellbeing and the third level education sector. It is important to ensure the student supports offered on campus are made available, accessible, well-resourced and adaptable in an online environment for students to use. USI believes student wellbeing best practices should become the minimum standard across all HEI's to ensure all students have access to high quality support services that can offer guidance when difficulties arise.

Recommendations:

- Funding allocated to HEI's to greater integration and cooperation between services, internally and externally.
- Funding for mental health services to reduce waiting lists.
- Sustainable annual core funding mental health, sexual health and physical healthcare services and facilities.
- Funding supports for peer learning programmes, clubs, societies and extra-curricular initiatives
- Implementation of the National Student Mental Health and Suicide Prevention Framework.
- HEA and HEI's should make student mental health a strategic priority.

Environment

Higher Education Institutions play an important role in addressing climate change, supporting research and active citizenship. The Department should place an emphasis on strategic and actionable climate action within HEIs to positively contribute to reaching carbon neutrality by 2050.

A focus on embedding active citizenship, environmental activism and the broader range of the sustainable development goals within the curriculum will ensure students and third level education communities can play a major role in meeting our climate action targets. Student representatives and key stakeholders such as the National Forum for the Enhancement of Teaching & Learning should be central to sectoral discussions on this area of work. Student representation should be facilitated in the Steering Group for the next Education for Sustainable Development strategy.

Recommendations:

- Support the tertiary sector to embed active citizenship, environmental activism and the Sustainable Development Goals in a meaningful way.

- Ensure student representation is facilitated in the Steering Group for the next Education for Sustainable Development strategy.

Conclusion

USI looks forward to engaging with the Department of Further and Higher Education, Research, Innovation and Science in the development of its' inaugural strategy over the coming months. Given the relatively short time frame given for this initial consultation, USI would welcome the opportunity to engage in further discussion with the Minister, and Department officials on the points raised above.

USI would also draw DFEHERIS' attention towards the 'Student Priorities for the New Government' document⁴ which USI produced when the Department was initially formed and was presented to the Minister at our first meeting in July 2020. This document sets out several other key priorities from the student perspective which it would be important for the Department to be aware of.

⁴ Union of Students in Ireland, 'Student Priorities for the New Government', 2020. Available at <<https://usi.ie/wp-content/uploads/2020/07/Student-Priorities-for-the-Next-Government-Final.pdf>>, last accessed 18 December 2020.