

Submission to the independent review of the Student Grant Scheme by The Department of Further and Higher Education, Research, Innovation and Science

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colleagues)

Introduction

The Department of Adult and Community Education, Maynooth University, welcome this opportunity to contribute to the consultation for the independent review of the Student Grant Scheme by The Department of Further and Higher Education, Research, Innovation and Science. Based on consultation with staff and students in our department, we present key discussion points and recommendations below about the current SUSI eligibility criteria and grant support, the potential impact of changing income thresholds and of widening the supports to include part time provision, postgraduate programme, FET learners and blended/online provision.

Since its establishment in 1974, the Department of Adult and Community Education (DACE) in Maynooth University has focused on meeting the educational needs of diverse groups in our society, supporting the transformation of lives and communities through adult and community education to create a just, equitable and sustainable society. Our work is informed by the experiences of students and staff of the department through programmes ranging from outreach certificates and diplomas, undergraduate and post-graduate programmes to thousands of students from diverse backgrounds on campus and across outreach centres nationally over the past 40 years. Our work is set within a broader context where Maynooth University welcomes students from diverse backgrounds, including having approximately half of its 1st year full-time undergraduate new entrants in receipt of a student grant, the highest proportion of students in receipt of a grant in the University sector (HEA 2015, 2017).

We consulted with staff and students in our department to explore their experiences and opinions on the student award system, including those in receipt of SUSI and those who are not currently eligible. We also consulted with the Communiversity Network of community based adult education coordinators and adult guidance services who are advocates for lifelong learning among the most disadvantaged groups. The document that follows is informed by the insights provided by these students, staff and community actors. In particular, we wish to highlight issues about current income thresholds and the costs of higher education; diverse student pathways and knowledge about progression; and the rationale and impacts of widening the supports to include part time provision, postgraduate programme, FET learners and blended/online provision.

Current income thresholds and costs of higher education

We feel that the funding currently offered by SUSI for students is inconsistent with central aims of the National Plan for Equity of Access to Higher Education (2015-2021) which has set a goal to improve success for underrepresented students. This is particularly evident from our work with students from under-represented groups over the years through community outreach, Continuing Education, and postgraduate courses including the Turn to Teaching project. Many of our students come from backgrounds and groups defined as the most under-represented groups in higher education by the HEA, including those from communities experiencing low progression, part-time/flexible learners, further education award holders and members of the Traveller community (HEA, 2015). In addition, we work with adult learners, many of whom have extensive familial and work responsibilities which have to be balanced with their learning.

Our research demonstrates that the current SUSI system fails to adequately cover the costs associated with study for eligible students, especially such as those from under-represented groups who often have complex circumstances. As is evident from the points below, we contend that the student grant systems need to be reformed to be more responsive to the complex needs and individual learning pathways of such students in order to fulfil its remit.

“For the people we work with from community, voluntary and youth groups, funding by SUSI would make a real difference. Many people who have taken part in our funded Level 7 certificate courses would like to continue in further education, but due to personal/family circumstances, are unable to take part in full time courses. The funding of part time courses would make third level education a possibility for many more people.” (Áine Byrne and Sinead Bashir County Kildare LEADER Partnership)

“Another cohort of people I have worked with whom would have a preference for Part time education in Galway are mothers returning to education especially mothers who would have left school with LC or lower and are looking to upskill in order to re- enter the workforce. Part time degree courses have fees of €3,000 (same as full time undergraduate courses) and this can be very prohibitive for mothers returning to education who would have a preference for part time education in order to continue to rear their family and upskill. If SUSI included part time blended courses this would be one less barrier for mothers returning to education.”
(Freedra Garman Lifelong Learning Officer, Social and Community Activation Programme (SICAP) Galway Rural Development)

As both of these points above illustrate adult learners have specific needs and contexts which impact on their eligibility for SUSI as well as the type of costs they incur which is explored in the Real Costs of Higher Education section.

Diverse student pathways and knowledge about progression

A review of student funding models needs to acknowledge the diverse learning pathways and progression of adults as lifelong learners. Many of our students have not experienced a linear progression through education from school to further education and training and/ or higher education. Instead they have and continue to balance work, family and learning in complex educational and occupational pathways through all stages of their lives. For many, this means interrupted and non-linear learning pathways and trajectories as they move in and out of education as their life circumstances dictate.

We recommend that the eligibility criteria and awarding structure of the student grant system needs to take this into account, including consideration of the creation of an individualised-orientated student grant system whereby *“everyone should be entitled to a least one grant in their lifetime to pursue their chosen education”* (MU student). Our consultation also highlights the need for a wraparound service where the student grant system is not considered in isolation, but placed within the wider context of how students experience SUSI as part of their educational journey.

Particularly significant is the need for adult education guidance initiatives (AEGI) and school guidance and counselling (SGC) to support students’ awareness of and application to SUSI. Many students from the most under-represented groups in our society lack the personal or familial experience, school or educational support or expectations, financial circumstances to successfully consider and navigate the student application and grant systems (Scanlon et al. 2019, McCoy and Byrne, 2011). The complexity of the current grant system, especially for those who may be eligible due to intersecting disadvantages, makes it a complex system to navigate. This is often combined with *“inappropriate guidance interventions, limited access to support services, reinforced low self-esteem, and restricted career and educational progression”* for under-represented groups (Elftorf and Hearne, 2014, 79).

The particular challenges for “New Irish” and from ethnic minority backgrounds emerged from a convened group consultation on April 9th. The issues that arise in this discussion were relevant for all students but the effect of these issues was significantly greater for those from ethnic minority backgrounds. In particular, the needs of students from ethnic minority backgrounds seeking to get into or progress in learning as adults include the following points. Many of these experiences are also evident across higher education nationally (Lenehan and Hogan, 2008, Kitching and Curtin (2012, Finn et al. 2018))

- Many do not have indigenous family support in Ireland.
- Migrant communities in Ireland try to support others in their community get into and through education but these communities are significantly more impoverished, have less resilience, and are often themselves traumatised from their migration journey.
- The process of applying for grant funding is significantly more difficult because English is often not their first language, especially in responding to official documents. Many do not have the cultural capital to know where to get trustful information, and so the steps into education and progression are unknown and difficult.
- Qualification for SUSI grants and the application process is significantly more difficult for a non-Irish applicant and many are not aware of the possibilities.

Real cost of HE

While higher education participation has increased exponentially over the past two decades (HEA 2010, 2015), certain sections of society, including those from ethnic minority and lower social socio-economic groups, and those with a disability have remained significantly under-represented (National Access Office, 2015; Byrne et al., 2013). Ryan’s research (2019) highlights the multiplying effects of the intersection of disadvantage for students accessing higher education.

Research completed with current students on our programmes indicate that students feel that the current levels of income thresholds for grant support are not adequate. They described it as *“a blunt tool, and the cut off point for fees and maintenance support is set at a low threshold. It removes accessibility for many low and medium income families.”* (MU student).

This is a particularly significant issue for students from under-represented groups in higher education.

“In SUSI workshops with parents and guardians, we meet with an increasing number of families who have first generation children accessing higher education but narrowly miss out on the SUSI grant due to household income exceeding the current SUSI thresholds. We would recommend that SUSI take into account the challenge of being ‘first in the family’ to access higher education in addition to the standard means test. Taking the first step into higher education is a significant challenge and the financial burden can often deter first generation candidates. The four secondary schools in our local area are DEIS schools and a large portion of our catchment area would be classed as ‘Very Disadvantaged’ by the Pobal Deprivation Index (<https://maps.pobal.ie/WebApps/DeprivationIndices/index.html>), yet we have a growing number of families who are not eligible for SUSI supports.” (Antoinette Patton, Education Support Officer Ballyfermot/Chapelizod Partnership)

There was some confusion and lack of clarity about how thresholds should be accessed with some contending that *“it should be based on income level of student not parent or spouse”* (MU student). Particularly problematic is the issue of how mature students present their case and are accessed. One student described how they were accessed:

As a mature student that returned to University I had to pay all fees myself. I live with my elderly parents who are on the state pension with a small rental income their income was added to mine when applying for the SUSI grant. I did not qualify because of this. I am not a dependant child but seen as one. I was a single parent living with my parents as I cannot afford to rent on my own. Each application needs to be treated individually. (MU student).

Students felt that it was preferable to remove the adjacent/non adjacent rates with a single rate for two reasons: i) some students chose to live on campus or in rented accommodation despite living within 45km and ii) because travel costs, accessibility routes and frequencies vary considerably.

Students who fitted current criteria felt that the current provision of information on the SUSI website is good as well the telephone support offered by SUSI staff were knowledgeable about the issues.

As part-time and/ or postgraduate students, many of our current students do not fit the current eligibility criteria for SUSI and so felt that the system was not relevant or did not clearly addressing multiple needs. For example one student describes how:

Its all a bit fractured. For me, I was offered a BTEA of 35 euro per week, which is god awful. I was told by an employee of the social welfare to apply for the illness benefit to help me. I applied for numerous grants but was declined by all. (MU student).

Our experience on the Turn To Teaching project highlights the significant unacknowledged cost for students in initial teacher training programmes at undergraduate and postgraduate level. High contact time both on campus and on placement means that students are learning and working on a full-time week basis and incur all the travel and subsistence costs associated with this. There is also a significant cost associated with materials and resources and clothing that student teachers are expected to have access to.

“Students participating in foundation level courses such as the Turn to Teaching programme, do not currently qualify for SUSI funding. This course has received funding support from the Community Sector in tandem with the Third Level sector, but requires investment in the

people embarking on their student journey, through financial assistance, if real change in the profile of teachers is to be achieved.” (Áine Byrne and Sinead Bashir County Kildare LEADER Partnership)

Overall, the students we surveyed recommended that the real costs of Higher Education for them include the following items and costings:

- Fees (variable but should include partial or full costs of part-time and postgraduate fees)
 - Accommodation– approx. €500 per month (but should include allowance for higher rental costs in urban areas such as Dublin)
 - IT costs (Laptop, wifi etc) and books/stationary etc €250 per month
 - General day to day costs (travel, lunch etc.) €300 per month (but varies depending on travel)
 - Childcare and eldercare varies depending on needs but approx. €400 per month
- * Note: This costing does not include general living expenses and acknowledges the varied locations and familial commitments of our students

Further Education and Training supports

In line with institutional and national policy shifts towards greater cohesion with Further Education and Training (FET) and into HE, there needs to be equity of funding opportunity for students within and across FET and HE (SOLAS, 2020). Further education is more effective at supporting lifelong learning and educational progress among cohorts of the population less likely to attend higher education. Further education students who progress to higher education have higher educational outcomes, have lower drop-out rates, and have increased confidence and focus when they progress to higher education from a further education setting. Following a consultation with FET students in Dunboyne College of Further Education on April 6, 2021 as well as the general student survey completed by the Department of Adult and Community education, the following issues about FET were noted.

FET fees are significantly less, relative to higher education fees, but in many cases maintenance fees are equal. Yet the SUSI grant covers 50% of the FET college fees for the students in this group. The SUSI grant is appreciated by those who receive the grant as a significant benefit relieving pressure from the student to secure part-time work or to require family support. As two of the group had originally started in HE, they discussed the costings for FET students and noted that the costs were similar to those cited for current HE students.

I strongly believe that more should be done to encourage adult learners to pursue further education and post graduate opportunities. I am acutely aware that financial constraints prevent this. I think the remit of student grants should be broadened to part-time and full-time post graduate courses and learners returning to further education (MU student).

The nature of means-testing for the student award system was highlighted as a challenging issue. The SUSI grant is means tested but the test is based on the family income rather than individualised to the student. The students become eligible because of the family income or benefit to the family. If this were to remain the case the eligibility should be re-focused on disposable funds available and, preferably, the grant would be based on the student’s own eligibility independent of

family. When the assessment is based on the family income, it places student in a difficult situation as the student will not qualify if they are working in part-time jobs or are living with their family.

Students noted that the SUSI grant does not cover all real-life costs. It is a supplement which is not adequate for those that have no other means of support. Indeed, it is noted that among the FET student group consulted some calculated that the SUSI grant was not worth the application and qualification effort. Further one student noted the difficulty in qualifying for a SUSI grant as they did not qualify due to separation maintenance support.

The focus group noted that the SUSI applicant only knows the outcome after the application process is complete. In many instances this may be after the course has started or after the student has withdrawn from the course due to financial pressures. This makes it impossible to plan. They reported that the eligibility channel on the SUSI website is indicative only and cannot assure the applicant that their application would be successful. They recommended that the SUSI grant should be a multi-annual grant for the duration of the course where the recipient will notify change of circumstance rather than being required to apply annually. Importantly the group noted the need for an accessible and universal guidance and advisory service for prospective and current FET students to help them plan financially and academically (as was highlighted in a previous section). Students felt that a common grants scheme should be developed which would include current supports being available to FET learners, but that they know little about the supports currently available to FET students and they felt that the student grant option needs to be promoted similar to the general awareness of the Springboard courses in the FET sector.

As noted in previous sections, reviews of student funding model highlights the often non-linear nature of the learning lives of adults (DES, 2000). The value of FET, as has been acknowledged, is that it allows a diverse range of learners to work out and through educational and occupational pathways (SOLAS, 2020). In effect, this can mean that learners have a number of 'false starts' at level 4, 5 or even 6 with lateral moves across various programmes as they work through a complexity of circumstances to develop a successful learning trajectory. Such lateral moves and explorations present little difficulty for students with adequate financial and cultural capital, but, can be career and education-limiting for socio-economically vulnerable learners who are denied funding supports if they don't progress in a neat, linear manner through levels 5 to 6 and upwards.

Furthermore, the review should acknowledge the blurring of any distinct lines of FET and HE awards and sectors: some students complete degrees in FET colleges (eg. Ballyfermot College of Further Education) and some students complete very successful HE foundation courses. Some students at Level 5 in FET get financial supports and other do not. These inconsistencies need to be resolved. Furthermore, foundation students studying at university, although regarded as students of the university, are denied recognition for SUSI maintenance supports and yet, are often, from cohorts that experience some of the highest levels and socio-economic disadvantage.

Supporting part-time learning journeys

The vast majority of part-time students are adult students. Adult students study part-time because they are not in a position to take up full time study. Two issues arise when considering the eligibility criteria for part-time students for SUSI. These are the stop-start nature of part-time study for adult students and the limits placed on them by outside responsibilities toward the type of qualification for which they can enrol.

Part-time adult students in many instances cannot commit, nor sometimes even imagine ever having the time and space needed to achieve a 'major' higher education award over a duration of two to

four years due to family, employment and other responsibilities. Secondly, although intimately connected with the first is the culture that has developed among adult students who want to stay engaged at some level with FET and HE, the necessity to participate in shorter courses due to costs. Affordability is one of the key issues for any adult thinking about participating in a HE course as stated below:

“Extending SUSI to part-time and blended courses would be of great benefit to our Mature students, especially our Lone Parent cohort. From our 1-1 guidance and workshops with the community, we find that mature students and lone parents often face the most challenges when accessing further and higher education. Part-time, blended courses would be the preferred choice for this group but these courses are currently not funded by SUSI. In our experience, students usually have to self-fund, apply for scholarships or appeal to charitable organisations in order to in engage with courses which adequately accommodate family and work responsibilities.” (Antoinette Patton, Education Support Officer Ballyfermot/Chapelizod Partnership)

If costs are a concern then the IUA discussion paper on Part-Time/Flexible students in Irish Higher Education make it clear that part-time students are doubly disadvantaged:

As well as not being eligible for a SUSI grant, part-time students are not eligible under the free-fees scheme either, meaning that their student fee can be significantly higher than the €3,000 per annum charged to eligible full-time students. Despite the national policy commitments to increase the numbers of part-time and flexible students, these funding arrangements for part-time students remain dissuasive. (IUA, 2019). IUA recognise the problems that attending part-time education courses can create for people on social welfare benefits and how this can affect their employability status. The recommendation in the paper is to look to the Springboard + model with some modifications as a precedent for funding for people studying part-time. (IUA, 2019: 12-14)

The piecemeal nature of registering for special purpose or minor awards which cost less leaves people with a plethora of certificates, which in practical terms for career development mean very little. Merely because these programmes are more affordable students who would like to pursue a major award end up occupying spaces on the lower reaches of the QQI framework without ever having the opportunity to turn their study into a larger award based on credit accumulation. Most major awards will not recognise credits beyond a threshold of 35% of the award being sought. In pursuit of greater awards based on credit accumulation when Recognition of Accredited Prior Learning has reached its limits means that many of students from the most under-represented groups are excluded as the following passage illustrates:

“Covid has changed the economic landscape and certainly in retail where we would have a higher percentage of people who may not feel they do not have the skill set for other sectors and will need support in upskilling. (Just under 23% of the wholesale /retail sector have a third level education: <https://www.cso.ie/en/releasesandpublications/ep/p-cp10esil/p10esil/ees/>) In order to make retuning to education more accessible for this cohort of people all part time/ blended education which is often chosen because people have family and or financial commitments should be included in the SUSI process.... adult learners need flexibility in order to upskill to either maintain or gain new employment and if part time courses were covered under SUSI, this could finally make part time education an option for people.” (Freeda Garman Lifelong Learning Officer, Social and Community Activation Programme (SICAP) Galway Rural Development

As the heading of this section contends part-time study is a lifelong learning journey and the pursuit of a major award, for instance a diploma or degree is for the adult student very much a process with many interruptions. To ameliorate this, we recommend that a system of credit accumulation linked to a personal FET/HE account where funding is made available. We recommend that the eligibility criteria and awarding structure of the student grant system needs to take this into account, including consideration of the creation of an individualised-orientated student grant system or system of credit accumulation linked to a personal FET/HE account where funding is made available on a pro-rata basis using the average cost of 1 credit on an undergraduate degree of 180 or 240 credits on the European Credit Transfer System as the benchmark for calculating the grant for the Part-Time modularised equivalent qualification. Monies from this account could be accessed upon registration and be dependent upon successful completion of a module as the component part of a larger award. A module not passed and credits not gained would be forfeit and the student would then be obliged to pay for the shortfall in credits to achieve the final award. This would obviate the exclusion from FET and HE under the present system that relies on individual wealth and make Lifelong Learning and Continuing Education a viable option for the adult population. It would also establish that Lifelong Learning is a right in the same way that primary and secondary education is a right and allow every citizen of the state to pursue **one** major Higher Education award in a way that is commensurate with their life conditions be this full time or part time.

Supporting postgraduate pathways for students

The disparity in the representation of certain sections of society, including those from ethnic minority and lower socio-economic backgrounds, and those with a disability at undergraduate level is intensified at postgraduate level. For many, a postgraduate route into professions is often the only option due to the persistent presence of structural and cultural barriers to the profession at undergraduate level. Financial pressures to cover the additional costs associated with postgraduate study forces students to work to pay fees and accommodation and living costs, which accentuates stresses associated with balancing academic work with work pressures. The demanding nature of postgraduate programmes, especially professional programmes such as teaching in terms of contact hours, placements and individual learning intensifies student stress. Cumulatively such a scenario accentuates the risk of such students experiencing mental health difficulties. This is particularly worrying considering that the National Student Mental Health and Suicide Prevention Framework (HEA, 2020) identified those from lower socioeconomic backgrounds as amongst the groups at higher risk of experiencing mental health difficulties. It is well established that amongst the factors that increase the risk of mental health difficulties for students are financial burdens and managing jobs and academic work (UUK, 2018; Dooley et al., 2019). A clear example of the negative effect the lack of adequate funding is having on students from lower socio-economic groups and their participation and progression in postgraduate studies is provided by data from the Diversity in Teacher Education (DITE) project (Keane and Heinz, 2015).

There is also an increasing awareness of problems associated with career guidance in schools and other educational settings serving communities experiencing intense social and economic disadvantage. This deficit of guidance support articulated by participants from lower social-economic groups contributing to recent research stemming from PATH 1 projects focused on supporting teacher diversity (e.g., Keane, Heinz, and Lynch, 2018) raises the question about the need to focus not only on the level of support SUSI provides but also ways in which access to knowledge of its supports can be made available to all on an equitable basis.

The student survey conducted by the Department of Adult and Community Education at Maynooth University indicates that students were supportive of the proposal that the supports of the common grants scheme should be open to postgraduate students arguing that it will encourage progression and support lifelong learning. They felt that “the costly fees are a huge deterrent for someone thinking of returning to education in a postgrad capacity” (MU student). They cited that many postgraduate students have the double impact of the substantial postgraduate fees as well as having a reduced earning capacity while they are engaged in postgraduate study.

Finally, we finish with a composite case study of a fictional student, Eimear, on the Think About Teaching Foundation Cert at Maynooth University. We do this in order to give due recognition to the intersectional and lived experiences of inequality and disadvantage, and how funding of postgraduate students would facilitate Eimear to overcome these barriers that are making it impossible for her to fulfil her ambition to become a teacher.

Eimear

Eimear is a 38-year-old mother who lives with her partner and three children in south Kildare. She completed a degree in Early Childhood in an Institute of Technology over four years ago and has been working as an SNA on a part-time basis in her children’s primary school. Eimear is passionate about education and is highly regarded in her work, especially in the school’s ASD unit. The teachers and principal in her school have been encouraging her for years to do the postgraduate masters in education (PMEd) for primary school teaching. Eimear always wanted to be a primary school teacher but she has been put off by the high cost of post-graduate fees. After her partner lost his job due to the pandemic, she decided to apply for the Think About Teaching foundation cert at Maynooth University. She had decided to use the year to work out if there was any way she could follow her dream. The school changed her schedule which has allowed her to work one and half days a week. As she is not entitled to a SUSI grant for the course, it is essential that she holds on to this work to help pay for her travel and expenses to attend the course on campus at the university. Despite her initial worries over her specific learning disability, the feedback from her tutors on the course is extremely positive and Eimear is gaining in confidence and self-belief that she could be a primary school teacher someday. She would be the first person in her extended family to be a teacher and she feels an increasing expectation from them to follow through – despite her efforts to explain what a foundation course is, many of them think that she has already on the teacher education programme. Eimear’s confidence in her own capacity is becoming increasingly eroded as the year continues as concerns about how she can pay for postgraduate fees start to mount. In an ideal world, Eimear would love to continue to work part time as an SNA and do the PME on a part-time basis. However, there is no part-time PME option available – and even if there was she would not get any funding support for a part-time course. Eimear can’t understand why people who need to work to survive and stay in college can’t be supported to study part-time. She wonders how the primary school teaching profession will ever become diverse when there are so many financial barriers towards getting a teaching qualification for people on lower incomes. She feels like the whole system is set up to make it impossible for her ever to become a teacher.

Blended and online provision

Our students were supportive of the proposal that a blended/online provision should be included in the current definition of an approved course in an approved institution as they felt it would give *“increased accessibility and support for professionals who are working and engaged in continuous professional development”* (MU student).

I think that blended/on-line and part-time provision would be very beneficial going forward to make education more readily available and reduce barriers such as location, family commitments, health, cultural and socioeconomic. It would offer a lot more flexibility and in doing so reduce inequality (MU student).

For others, they felt that online and blended offerings should not be included and would be “*a huge financial expense to the exchequer*” (MU student). Research that we have completed during the pandemic when we had to quickly shift our provision online revealed significant differences in working and learning conditions and capacities amongst educators and students, due to limited wifi connectivity or technological knowledge to access online platforms (Barter and Grummell, 2020; EAEA, 2020). While not within the scope of this review, it raises the wider equity issues for the student grant system where significant grants need to be made available for IT hardware, wifi connectivity and digital literacy capacity building as part of any move to fund blended provision.

Recommendations and Conclusion

Based on consultation with staff and students in our department, this document discussed the key points emerging with a series of recommendations below about the current SUSI eligibility criteria and grant support, the potential impact of changing income thresholds and the impact of widening the supports to include part time provision, postgraduate programme, FET learners and blended/online provision. We feel that the funding currently offered by SUSI for students is inconsistent with central aims of the National Plan for Equity of Access to Higher Education (2015-2021) which has set a goal to improve success for underrepresented students.

Current income thresholds and costs of higher education

The current SUSI system fails to adequately cover the costs associated with study for eligible students, especially such as those from under-represented groups who often have complex circumstances. We recommend that **the student grant systems should be reformed to be more responsive to the complex needs and individual learning pathways** of such students in order to fulfil its remit

Diverse student pathways and knowledge about progression

We recommend that a review of student funding models needs to acknowledge the **diverse learning pathways and progression of adults as lifelong learners** who balance work, family and learning in complex educational and occupational pathways.

We recommend that the eligibility criteria and awarding structure of the student grant system needs to take this into account, including consideration of the creation of an **individualised-orientated student grant system** or system of credit accumulation whereby everyone should be entitled to a least one grant in their lifetime to pursue their chosen education.

We recommend that the **notifications for the award system** needs to occur in a more timely manner with students informed of the outcome earlier when they begin their studies.

We recommend that the grant should to be a **multi-annual grant for the duration of the course** where the recipient will notify change of circumstance rather than being required to apply annually.

We recommend a **wraparound service** where the student grant system is not considered in isolation in these reviews, but placed within the wider context of how students experience SUSI as part of their educational journey. Particularly significant is the **need for adult education guidance**

initiatives (AEGI) and school guidance and counselling (SGC) to support students' awareness of and application to SUSI, especially for students from the most under-represented groups in our society who lack the personal or familial experience, school or educational support or expectations, financial circumstances to successfully consider and navigate the student application and grant systems.

Specific communities such as those from ethnic minority backgrounds face particular issues which common award system and student support service need to account for. We recommend **specific engagement with communities under-represented in HE** to establish their needs and issues, including those from the most under-represented groups but also those from other communities including migrant communities in Ireland.

Real cost of HE

We recommend that the current levels of income thresholds for grant support for students is not adequate and the **cut off point for fees and maintenance support is set at a low threshold** that removes accessibility for many low and medium income families. This is a particularly significant issue for students from under-represented groups in higher education.

We recommend that it is preferable to **remove the adjacent/non adjacent rates with a single rate** for two reasons: i) some students chose to live on campus or in rented accommodation despite living within 45km and ii) because travel costs, accessible routes and frequencies vary considerably.

We recommend that any review of costing **includes the multiple needs of part-time and/ or postgraduate students**. Particularly problematic is the issue of how **mature students** present their case and are accessed.

We recommend that the **real costs of Higher Education** include the following items and costings:

- Fees (variable but should include partial or full costs of part-time and postgraduate fees)
 - Accommodation– approx. €500 per month (but should include allowance for higher rental costs in urban areas such as Dublin)
 - IT costs (Laptop, wifi etc) and books/stationary etc €250 per month
 - General day to day costs (travel, lunch etc.) €300 per month (but varies depending on travel)
 - Childcare and eldercare varies depending on needs but approx. €400 per month
- * Note: This costing does not include general living expenses and acknowledges the varied locations and familial commitments of our students

FET sector

We recommend that supports of the common grants scheme should be **open to FET students and clearer pathways through the grants system to higher education** should be created. We recommend that **greater awareness** of the student grant system is needed across FET.

Supporting part-time learning journeys

We recommend that supports of the common grants scheme should be **open to students on part-time programmes**. A **system of credit accumulation linked to an individualised-orientated personal FET/HE account** should be created to ensure students can access funding as they need.

Supporting postgraduate pathways for students

We recommend that the supports of the common grants scheme should be **open to postgraduate students** as it will encourage progression and support lifelong learning

We also recommend that this review assesses the **significant unacknowledged cost for students in professional courses including initial teacher training** at undergraduate and postgraduate level. High contact time both on campus and on placement means that students are learning and working on a full-time week basis and incur all the travel and subsistence costs associated with this. There is also a significant cost associated with materials and resources and clothing that student teachers are expected to have access to.

Blended and online provision

We recommend that a **blended/online provision should be included** in the current definition of an approved course in an approved institution.

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