



Mary Mitchell O'Connor, TD
Minister of State for Higher Education

31 August 2018

AONTAS thanks you for the opportunity to provide our views as amendments to the Higher Education Authority Act are considered by yourself and the Department of Education and Skills.

Should you have any questions, or should you wish to speak further about any of the proposals made in this submission please do not hesitate to contact AONTAS at your convenience.

1. What should be the key functions of the Higher Education Authority?

As it reads currently, the [Higher Education Authority Act, 1971](#) outlines one of its key functions as, 'promoting the attainment of equality of opportunity in higher education.' AONTAS would like to see this function transformed into a focus on promotion of *educational equity and inclusion* in higher education, with particular emphasis placed on increasing access pathways from Irish Further Education and Training (FET) and Community Education. Both FET and Community Education serve a diverse population of learners including those socially and economically disadvantaged, therefore a clear commitment to promoting progression pathways for these learners would mean a deeper commitment to a more equitable and inclusive Irish higher education system.

This call is an extension of the ambitious work already being done by the HEA and in the field of Irish education more broadly. Equality of opportunity has always been a core principal within Irish Higher Education. [The University Act 1997](#) contained a number of key provisions rooted in concepts of equality, equity, and inclusion. For example, Section 12.f required universities to 'support and contribute to the realisation of national economic and social development', while Article 18.6.b further stated that universities should 'have regard to the attainment of gender balance and equality of opportunity among students and employees.' Since the implementation of this act, Ireland has seen a number of legislative changes that progressed this principal even further. The current [National Plan for Equity of Access to Higher Education, 2015 – 2019](#) adopted a language of equity and inclusion, arguing that a comprehensive strategy to increase participation rates among disadvantaged populations, was beneficial to the overall social and economic advancement of Irish society. The Department of Education and Skills' [Action Plan for Education \(2016-2019\)](#) described equity and inclusive education as a 'fundamental principal of the education and training system in Ireland.' This shared commitment to advancing conversations of educational equality to include concepts of equity and inclusion as a core component of the Irish educational landscape, reflects the progress that has been achieved.

Yet, in spite of these efforts, for adult learners, a number of barriers in higher education still exist. In recent years, while overall progression rates into higher education have increased from 55% in 2007 to 69% in 2016, participation rates of mature learners in Irish higher education has remained relatively stagnant. The recent [Higher Education System Performance Report, 2014-2016](#) found that mature students entering higher education from 2011 to 2016 remained at 14%, despite smaller increases present in participation rates of students with disabilities and students from underrepresented groups (SEGs). In response to these findings, the report recommended that the HEA work with ETBs to develop clear progression pathways from FET into higher education. Similarly, the FET sector also highlighted in the [Progress Review of the Further Education and Training Strategy 2014 – 2019](#) that alongside increasing progression targets, ETBs, QQI, and SOLAS should work together to explore ways to increase flexibility in progression pathways. AONTAS welcomes these changes. Through the [National FET Learner Forum Advisory Report 2017](#) learners have recommended that HEIs and ETBs work cooperatively to increase the number of reserved places for FET learners in HEIs and for FET providers to develop a clear mapped trajectory from FET into higher education.

At the heart of the calls for an extension of equitable and inclusive educational practices in Irish higher education is as a belief in the social responsibility of HEIs to promote the educational advancement of all people in society. This is, of course, a challenging task, and one in which universities will have to work cooperatively with government to ensure progress is made. Success will require cooperation between a number of government agencies, NGOs, HEIs and the HEA. Building links between the FET and Community Education sector and the Irish higher education sector will help achieve a truly equitable and inclusive education system.

2. What role should the Minister have in relation to regulation of the Higher Education Sector?

In order to ensure universities and government are cooperatively promoting educational equity and inclusion in Irish higher education, it is recommended the Minister:

- Oversee the system of governance between HEIs and the HEA
- Align broader government initiatives aimed at social inclusion and equity to policy initiatives within the HE sector
- Ensures HEIs are achieving established benchmarks, particularly in the promotion of equity and inclusion within the university sector
- Invest in cooperative initiative between HEA, Irish FET providers, SOLAS, and the Community Education sector

3. Are there any related updates required to other Acts?

Updates to legislation that would help solidify and promote educational equity and inclusion in the Irish higher education system include the following:

- Recommendation 2 for Teaching and Learning of the [National Strategy for Higher Education to 2030](#) calls for the creation of a national survey to ‘capture feedback from students, and use this feedback to inform institutional and programme management, as well as national policy.’ AONTAS fully supports and praises this venture, particularly in its call for HEIs to ‘couple these with structures to ensure that action is taken.’ This practice will help to ensure the HEIs are not only engaging, but responding to the needs of learners.
- In an effort to increase the ‘democratisation of the structure of higher education’ as outlined in the [Higher Education Authority Act 1971](#), AONTAS further recommends the endorsement of broader forms of *active learner voice engagement*. In particular, we would like to see the creation of a National Higher Education Learner Forum alongside the development of a student engagement strategy that incorporates both formal and informal student engagement strategies. The purpose of this broader initiative is to ensure the voice of under-represented learner groups, whose voices are often omitted from formal representative and survey models, are still included in student engagement frameworks.

Solidifying these learner voice initiatives in legislation will help ensure that learner voice becomes an integral part of the policy development and evaluation process. It will ensure that the commitment to hearing learner voice will not cease because of changes of government policy.

4. Is a Registration model for Higher Education Institutions appropriate?

AONTAS does not have a definitive recommendation on this question. However, regardless of the model chosen, it must ensure that HEIs promote educational equity and inclusion, and that HEIs remain responsive to the policy goals of the state; particularly as these goals concern the creation and maintenance of an equitable and accessible HE system.

5. Are there international models of regulation which should be examined as part of the process of updating the Act?

There are international models for student engagement AONTAS would like to see included in the process. These international model are:

1. Finland: Finland is highlighted for its belief in education having ‘no dead-ends’ and exploring clear pathways for all learners to access free educational opportunities that will lead to higher-level education.

For further information, please see the [Finnish National Agency for Education](#).

2. Scotland: Scotland provides a robust strategy on how to increase university access to education among students from underrepresented group (SEGs), particularly through the work of the Commissioner for Fair Access and the Access Delivery Group.

For further information, please see the [Scottish Government](#).

3. Canada: British Columbia provides an example of higher education initiatives that incorporate community engagement as a component of increasing learner access.

For further information, please see [British Columbia Education and Training](#).

6. The following are some of the areas that could be considered for updating and/or inclusion in the Act. Are there other areas which should be considered?

The University Act 1997 made a commitment to the promotion of Lifelong Learning. AONTAS would like to see this commitment revalidated and updated in the Higher Education Authority Act to include a promise of projected growth rates by all HEIs. While Ireland has recently made progress in its overall lifelong learning participation rate, seeing its participation rate rise from 6.4% in 2016 to 8.9% in 2018, Ireland is still below the European average rate of 10.9%. Recently, a number of strategies have incorporated recommendations to address this gap. [Ireland’s National Skills Strategy 2025](#), for example, called for a ‘substantial increase in lifelong learning levels’ in both formal and informal settings. The Irish Higher Education sector has a key role to play if Ireland is to continue working towards its goals of reaching a lifelong learning participation rate of 15% by 2020. Irish HEIs should develop a plan of how they will support this initiative within their own strategic plans and work directly with the HEA to ensure targets are being achieved.

7. How should the HEA monitor compliance within the Higher Education Sector?

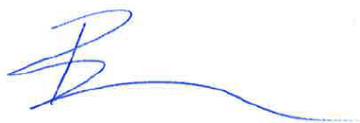
Compliance with the standards established by the HEA should be monitored by the HEA and reported to an established body with representatives from the HEA, HEIs, higher education learners, and independent participants.

8. Are there any other relevant issues which you wish to comment on?

There are no other issues on which AONTAS would like to comment. We would however like to express again the importance of ensuring that access to higher education is built into the legislative foundation upon which HEIs in Ireland are built.

Ireland is successful because our people are seen around the world as highly educated; particularly at third level. Yet unfortunately access to educational opportunity remains closed to many people across the country. By creating a legislative basis for the creation of educational equity and inclusion, Ireland will be taking a firm step toward ensuring that positive opportunities and outcomes can be shared by all citizens.

Sincerely,

A blue ink signature of Benjamin Hendriksen, consisting of a stylized 'B' followed by a long horizontal flourish.

Benjamin Hendriksen
Advocacy Lead
AONTAS

A blue ink signature of Leah Dowdall, written in a cursive style.

Leah Dowdall
Learner Advocacy Officer
AONTAS