

AHEAD/Disability Federation of Ireland Joint Submission to the Review of SUSI – the Student Grant Scheme

To: The Department of Further and Higher Education, Research, Innovation and
Science

A Submission by AHEAD and the Disability Federation of Ireland (DFI)

Introduction

AHEAD and DFI welcome the recent commitment from Minister Harris to review SUSI – the Student Grant Scheme.

AHEAD and DFI have compiled this brief submission based on our shared understanding of this issue with consultation from the AHEAD/USI Students with Disabilities Advisory Group and members of the Disability Federation of Ireland.

Societal and Educational Context

In order to combat the risk of systemic poverty and unemployment of people with disabilities, meet its commitments in relation to the implementation of the United Nations Convention on the Rights of People with Disabilities (UN CRPD), and achieve its United Nations Sustainable Development goals, the state must provide equity of access to further and higher education and enable all students to have the opportunity to attain high levels of educational qualification. Article 24 of the UN CRPD emphasises the state's obligation to ensure that people with disabilities have an equal right to access tertiary education.

People with disabilities in Europe are twice as likely to live in poverty (European Disability Forum's Human Rights Report, 2020) than those with no disability, a statistic replicated here in Ireland (ERSI, 2014). They are also less than half as likely to be in employment as their non-disabled peers (ESRI, 2017).

The most recent CSO SILC data (2019) from Ireland highlights the extent of poverty today:

- The consistent poverty rate for people not at work due to illness or disability is 18.1%. This rate for the general population is just 5.5%, meaning people who rely on state disability payments are more than 3 times as likely to live in consistent poverty as the average person.
- The 'at risk of poverty' rate for this group is 37.5%. By contrast, the 'at risk of poverty' rate for the general population is 12.8%, 3 times lower than that for people with disabilities.

Ireland performs worse than fellow EU countries on related metrics, with one of the lowest levels of poverty of people with disabilities in the EU, and the lowest employment rate, at just 32.3%. This is significantly lower than the EU average of 50.8% (European Disability Forum, 2020).

Education can be a route out of poverty for people with disabilities and increase employment prospects. However, the probability of having no educational qualifications is increased by 22 percentage points for someone who is 'severely hampered' as a result of disability, and about 18 percentage points higher if 'hampered to some extent' (Nolan, 2014a). For tertiary education provision to be equitable, financial barriers to accessing education for people with disabilities must be addressed through state supports, including student grants.

Financial barriers are frequently cited by students with disabilities as a major barrier to participation in further and higher education. On the one hand, many students with disabilities have significantly higher daily living and learning costs than other students relating to their disability, for example medical service costs, the higher cost of low availability accessible housing, counselling services, specialised diets and increased transport costs.

The added cost of disability is recognised as a major factor in significantly higher poverty rates for people with disabilities in general (ERSI, 2014). On the other hand, students with disabilities, unlike other students, may have significantly reduced opportunities to participate in incidental work to support their studies and make ends meet. One of the reasons for this is the difficulty people with disabilities experience accessing employment, as evidenced by the low employment rate already discussed. Furthermore, it can be more difficult for students with disabilities to balance part-time work with

education for a range of reasons. Students with disabilities often need to spend more time on course material due to additional learning needs, or may already be balancing the demands of completing their studies with attending medical appointments etc.

SUSI offers a mechanism to help address the double disadvantage caused by the intersection of disability and socio-economic disadvantage, and significantly reduce barriers for access to further and higher education.

Recommendations

As a result of research and consultation with the AHEAD/USI Students with Disabilities Advisory Group and the members of DFI and AHEAD, we recommend the following changes to the Student Grant Scheme to promote equal access to, and participation in, further and higher education:

Recommendation 1: Recognise the proven added cost of living and learning with a disability by providing additional SUSI grant funding to students with disabilities to cover disability-related living costs.

Rationale: Currently, in determining the eligibility of individuals and the level of grant awarded, SUSI examines household income, but does not consider the impact of disability and the proven additional outgoing expenditure of living with a disability. Cullinan and Lyons (2015) estimated the added cost of living with a disability to be an average of €207 per week (with a higher range estimate of €276), totalling an average of more than €10,000 a year.

For students, these additional costs incurred may include medical and social care service costs, the higher cost of low availability accessible housing, off-campus professional counselling services, specialised diets and increased transport costs. It is imperative that the state recognise these added costs, as well as the decreased opportunities for supplemental employment, and provide additional support to achieve equity of access.

Recommendation 2: Widen eligibility for SUSI to part-time learners.

Rationale: Part-time learning offers a very suitable pathway for many students with disabilities to manage the impact of their disability and continue learning. However, while 7.7% of the full-time higher education population are registered with Disability Support Services, only 1.3% of the part-time population are registered (AHEAD, 2020), with many reporting financial barriers to participating in part-time study. Opening eligibility for SUSI to part-time learners would remove a significant barrier to participation for individuals who may otherwise be unable to engage with further and higher education courses. The opening of eligibility for the Fund for Students with Disabilities to cover the cost of supports for part-time learners in recent years recognised the underrepresentation in this mode of study, and there is a need for SUSI to mirror that in order to achieve higher participation of students with disabilities in part-time study. SUSI grant levels awarded could be equitably awarded on a pro rata basis, linked to academic credits or other tangible measures.

Recommendation 3: Widen eligibility for SUSI to all FET learners.

Rationale: FET programmes offer a valuable learning pathway to independent living, employment or further study for many individuals and may be a more suitable alternative to higher education for many individuals with disabilities. FET programmes can also be extremely beneficial to adults who acquire disabilities, as it can offer a valuable pathway to re-train and re-enter the workplace. The recent Future FET Strategy (SOLAS, 2020) recognises people with disabilities as a “priority cohort”, states that addressing their needs will be “a primary focus”, and makes a commitment to providing “consistent learner support” at all programme levels under its strategic priority of Inclusion. This can only be achieved when the significant financial barriers experienced by learners with disabilities are recognised and mitigated against. The widening of SUSI eligibility to include FET learners on all levels of the National Qualifications Framework would increase equity of access to FET programmes and support the Department to provide a consistent experience and expectation for learners transitioning between FET programmes and from FET to higher education programmes.

Recommendation 4: Widen eligibility and availability of the grant to all postgraduate students.

Rationale: AHEAD research highlights low participation of students with disabilities in post-graduate study. While 7.1% of undergraduate students are registered with disability support services in higher education, only 2.4% of students are registered at

postgraduate level (AHEAD, 2020), highlighting the significant access barriers to postgraduate study - many of them financial in nature. Financial barriers are frequently cited in discussions with AHEAD as the biggest barrier to undertaking programmes at this level. Widening eligibility for SUSI to all postgraduate students, including PHD students, would facilitate greater access to this level of study for students with disabilities.

Recommendation 5: Work with the Department of Health to ensure SUSI is not considered eligible income in the calculating of Medical Card eligibility.

Rationale: “When I got SUSI, my medical card was taken off me and instead, I was given a GP visit card and this meant I had to pay for hospital visits and medication – I was told when I finish college, I’ll get my medical card” – Students with Disabilities Advisory Group member.

In many cases, the income garnered from a SUSI grant can place students over the eligibility threshold for some state supports and trigger the removal of the Medical Card and/or other important secondary supports such as the Travel Card and Rent Supplement. Recognising the added cost of living and learning with a disability, as well as the higher reliance on medical services many students with disabilities have, retaining the Medical Card is absolutely essential for many students with disabilities to proceed with further or higher education study. It is important to recognise the safety and health security that access to the Medical Card provides and ensure that the SUSI grant is clearly stated as an income disregard in determining Medical Card eligibility.

Recommendation 6: Allow students with disabilities to retain full access to the SUSI grant for the full length of their extended studies, where colleges permit them to conduct their studies over a longer period of time as a reasonable accommodation.

Rationale: In a small number of cases, students whose disability has a significant impact on their learning will be granted a longer period of time to complete their studies by their institution e.g., completing a typically 3-year degree over 4 or 5 years. When a reasonable accommodation like this is granted by an institution, is often due to the longer time it takes for some students to complete learning activities like reading and writing due to their disability, to periods of prolonged medical absence, or because medical conditions for example chronic fatigue mean that students cannot engage in the same number of learning hours per week as other students. This reasonable accommodation, identified through a needs assessment, is a legal entitlement and is

vital for students to participate in and complete their studies effectively. However, many students report that in some cases, SUSI does not consider this to be full time study, and so may remove their eligibility, even though the student in question may be engaging in the same number of learning hours as peers. Where students have successfully appealed decisions on this basis, often the protracted process has meant that the decision to award/reinstate the SUSI grant has come too late and the student has already dropped out of their studies. This could be avoided by clearly stating that students can automatically retain access to their full SUSI award for the entire length of their studies in these circumstances, and by establishing a clear and efficient process for institutions to report the granting of an extended study period as a reasonable accommodation for individual students.

Recommendation 7: Develop a simple and hassle-free process for SUSI awardees to extend their SUSI grant when a repeat is granted on medical grounds

Rationale: Students are often facilitated by higher education institutions to repeat a year of their studies, or a number of modules, on medical grounds. This can happen for a variety of reasons for example an accident-causing temporary disability, mental health difficulties or the managing of an ongoing illness or condition requiring significant unanticipated medical care which interrupts their studies. Currently, a student wishing to repeat on medical grounds must engage with a lengthy and arduous appeals process to secure an extension of their SUSI grant – often at a time when they may be very unwell. In reality, many drop out rather than complete the process. This could be avoided by developing a straight forward procedure whereby SUSI gives institutions/ETBs the authority to confirm that a repeat on medical grounds has been granted, automatically triggering eligibility for an extension of the SUSI grant.

Recommendation 8: Ensure students with intellectual disabilities attending higher education courses are eligible to apply for the SUSI grant

Rationale: Currently, students with intellectual disabilities who attend specialist higher education programmes have no access to SUSI, despite some of these programmes being both full-time and leading to Level 5 awards. These Level 5 programmes aimed at students with intellectual disabilities are not featured on the list of SUSI-approved courses – likely because it is atypical for Level 5 courses to be delivered in a higher education setting. It is imperative that any changes to the approved list of SUSI courses address this barrier to participation, which unfairly impacts on an already disadvantaged cohort.

Recommendation 9: Ensure students attending online further and higher education courses are eligible to apply for the SUSI grant

Rationale: The word ‘attend’ in the Student Support Act 2011 section 8 (1) b has been interpreted by the Department of Further and Higher Education, Research, Innovation and Science as a requirement for physical attendance. The Act, and accordingly the definitions of an approved SUSI course, should be updated to explicitly include online attendance in the definition of attendance. Online courses can be a more accessible option for many people with physical and/or sensory disabilities, for whom physical attendance presents many barriers. However, students attending online courses cannot currently access the SUSI grant which means some people with disabilities cannot avail of this option. Students who avail of online courses incur significant costs including digital equipment, course materials and books, high-speed WIFI, increased heating and electricity bills etc. COVID-19 has exacerbated the inequality experienced by students with disabilities accessing online courses. While almost all students are currently studying predominantly online, only those whose courses were intended to be delivered face to face have access to SUSI support and this needs to be addressed to provide equity of access for students with disabilities.

To give one concrete example, DFI are involved with a HEA Innovation & Transformation project run by IT Sligo to deliver fulltime online courses for students who cannot attend campus for a variety of reasons (e.g., students with disabilities, carers, students experiencing geographical isolation etc.). Students on this course are not currently eligible for the SUSI grant.

The Importance and Benefits of these Recommendations for Students and the State

AHEAD and DFI believe that implementing these recommendations will act as a win-win for students, the state, and society at large, with increased access to educational opportunities for students with disabilities, increased diversity in the further and higher education community, further recognition from the state of the commitment to education for all as a public good, and a significant long term economic dividend for the economy.

These regulations would:

- Level the playing field for students with disabilities by recognising the added cost of living and learning with a disability, and providing certainty and health security for students wishing to engage with education and improve their long-term economic prospects by obtaining a qualification.
- Support the state in meeting its responsibilities under the UN Convention on the Rights of People with Disabilities (UNCRPD), achieve its UN Sustainable Development goals and its targets set out in the FET Strategy, National Access Plan and Comprehensive Employment Strategy for People with Disabilities.
- Evidence the state's commitment to education for all as a public good and its commitment to supporting access for people with disabilities to further and higher education.
- Provide a significant long-term economic dividend for the state, by supporting students with disabilities to increase their employability and earning potential through engagement with education. These higher-earners would return initial investment many times over in the future through increased income tax returns over their lifetime and reduced reliance on state disability and unemployment supports post-graduation.

Concluding Statements

AHEAD and DFI are happy to meet with Minister Simon Harris, or a representative of the Department of Further and Higher Education, Research, Innovation and Science to discuss the contents of this submission if required and hope the submission proves useful in shaping the redevelopment of the SUSI grant.