



Department of Education and Skills,  
Marlborough St,  
North City,  
Dublin 1.

Dear Minister Mitchell-O'Connor,

On behalf of the **Trinity Centre for People with Intellectual Disabilities (TCPID), Trinity College Dublin**, which runs an inclusive education programme specifically for students with intellectual disabilities. We wish to express views on updating the Higher Education Authority Act 1971 following your invite for a public consultation.

The submission is directed to Section 8. "Are there any other issues which you wish to comment on?" of the call for a public consultation.

TCPID takes a particular focus on the inclusion of people with intellectual disabilities in the higher education system in Ireland. The HEA has the responsibility of ensuring the Higher Education system, across Ireland, is accessible for students who are deemed to have intellectual disabilities.

**Context:**

It is documented that people with intellectual disabilities have historically been absent from participation within the higher education system in Ireland. According to the National Intellectual Disability Database report 2017, 84 people with an intellectual disability were recorded in "Third Level Education" out of a total of 57,872 people with an intellectual disability recorded in the study of day service provision. This equates to 0.145%. (NIDD, 2017).

Ireland has recently ratified the UNCRPD in 2018. Article 24 of the UNCRPD endorses "States Parties recognize the right of persons with disabilities to education. With a view to realizing this right without discrimination and on the basis of equal opportunity, States Parties shall ensure an inclusive education system at all levels and lifelong learning" (United Nations, 2018).

Both nationally and internationally it is recognised that unemployment and underemployment are critical issues affecting the lives of people with intellectual disabilities. People with intellectual disabilities experience many barriers in the pursuit of

meaningful employment including low levels of literacy and numeracy, lack of self-confidence and difficulties understanding workplace procedures (Mc Glinchey et al., 2013).

The recent ESRI Report (2017) on *Employment Transitions Among People with Disabilities in Ireland* provided further compelling evidence that people with intellectual disabilities are particularly disadvantaged in gaining and retaining employment.

*“The chances of entering employment are particularly low for those with intellectual disability; even controlling for level of difficulty, the odds are only about one-third of those of someone without a disability”*

Minister Regina Doherty responded to the ERSI Report,

*“Poverty is not just about income. It is multidimensional and it is complex. So the actions we take to address poverty and social exclusion in Ireland must take account of this diversity and complexity; and we will continue with our ‘whole Government approach”* (Doherty, 2018)

#### **Current:**

Jobs are becoming increasingly skills and knowledge-based which can pose an additional barrier for people with intellectual disabilities. People with intellectual disabilities face very limited choices on completing compulsory schooling and though increasing numbers have completed education in a mainstream school many students end up in adult day centres or local vocational training centres where often they are enrolled in courses they have little or no interest in, but they meet the criteria for entry.

*“There aren’t enough education opportunities for people with disabilities when we leave school. The training that we do doesn’t lead to jobs. Sometimes we do training courses because there is nothing else to do.”* (National Platform of Self Advocates, 2018)

TCPID welcomes the recent cross-departmental approach shown by Government with the bringing together of three Joint Oireachtas Committees (Employment Affairs and Social Protection; Education and Skills; Health) on the Review of Supports Available to People with Disabilities Transitioning from Education or Training into Employment.

This report highlights the voices of people with disabilities, who have attempted to, or have successfully, navigated the Irish education system. The report values the lived experience of people with disabilities. The underlying theme extracted from these voices was “luck”. Each of the speakers in this report mentioned how they were the “lucky ones”.

*“I should not feel lucky. This should be an automatic human right for everyone.”* (Daily, 2018)

### Challenges to be Considered

#### **CAO Access:**

Access to Higher Education in Ireland is primarily focused on the Central Application Office (CAO) points system, which is offered from the State Leaving Certificate, usually sat by students at the end of their secondary level schooling.

The majority of students with Intellectual Disabilities in both the Special Education System and in Mainstream Schooling in Ireland, often finish secondary level schooling with the equivalent of the Junior Certificate level of qualification which does not offer CAO points, meaning this group of students is not eligible to apply to the CAO for a College/University course.

#### **DARE:**

DARE offers reduced points places to school leavers who, as a result of having a disability, have experienced additional educational challenges in second level education. As stated above, the DARE system is also exclusionary to many students with intellectual disabilities who have completed secondary school with a Junior Certificate qualification.

#### **HEAR:**

The Higher Education Access Route (HEAR) is a college and university scheme that offers places on reduced points and extra college support to school leavers from socio-economically disadvantaged backgrounds.

The same issue as above (DARE/CAO) applies to the HEAR system for students with intellectual disabilities.

#### **Fund for Students with Disabilities (FSD):**

In 1994, the then minister for Education recognised the need to support students with disabilities and set up the Fund for Students with Disabilities in Higher Education. The introduction of the fund and the development of Disability/Access Support Services within higher education providers, has had phenomenal success in including students with disabilities in the higher education system which now represents the diversity of the population of Ireland.

However, "Intellectual Disability" is not a named disability on the criteria for the FSD (Higher Education Authority, 2018). Whereas, the Census 2011 and other official documents named "an intellectual disability" as one of several definitions for people with a disability (Employer Disability Information, 2018). This is a systematic oversight which suggests a lack of expectation for students with intellectual disabilities to progress on to higher level education. A simple amendment to the list of disabilities to include "Intellectual Disability" would be a very encouraging step towards the recognition of the capabilities of students with intellectual disabilities in Ireland.

**Review of FSD for Part-Time and Occasional Students:**

Currently, students registered as part-time or occasional students are not eligible to apply for FSD. The Disability Advisor Working Network (DAWN) is working with the HEA to review the criteria for allocating FSD. Many students studying on inclusive educational programmes/access routes currently in operation in Irish HEI's are registered as part-time and/or occasional students. It is purely because of the total hours spent attending lectures and tutorials each week that may determine these students to be registered on a part-time basis. However, this does not take into account the amount of additional time and support that students with intellectual disabilities often require in order to keep up with coursework and study. More often than not, students on these programmes/access routes are attending College/University four and five days per week to compensate for the added effects of living and studying with an intellectual disability.

**Core Funding:**

There are currently, ten specialised programmes that are accessible for students with intellectual disabilities in different higher education institutions across Ireland. However, each of these programmes are under-resourced, under-funded and unsustainable without the support of the HEA and the Department of Education. Many of these individualised programmes are funded through philanthropic and/or charitable donations, meaning funding is both sporadic and indefinite. Without core funding from the Department of Education and the support of the HEA, many of these courses are starting to become obsolete, such as the Inclusive Learning Initiative at Maynooth University (2011 – 2018).

Although many of these specialised programmes for students with intellectual disabilities are funded through the good will and gesture of generous donors, they do not have the capacity to grow or develop. Core funding from government for such programmes would ensure the continued operation and success of these existing programmes as well as the development of future accessible courses for students with intellectual disabilities.

TCPID (formally National Institute for Intellectual Disability) Trinity College Dublin, was the first HEI to open their doors to students with intellectual disabilities in Ireland. TCPID are dedicated to leading the way as experts in the field of inclusive higher educational practices. The Arts, Science and Applied Inclusive Practise (ASIAP) course being run by TCPID has completed the first cycle where we have supported six students to achieve a QQI Level 5 qualification, engage in work experience with TCPID's business partners and paid summer internships for all of our (soon to be) graduate students.

The ASIAP course is the only inclusive educational programme specifically for students with intellectual disabilities operating at Level 5 on the National Framework of Qualifications, addressing the significant gap between secondary level school and the world of work for many young people with intellectual disabilities. TCPID's Occupational Therapist and Employment Pathways Coordinator ensure a structured pathway into meaningful employment for ASIAP students. This is a model that has been trialed and tested. We have shown the positive effects for both the individuals and the knock-on effects of diversity in the HE system and within TCPID Business Partners.

### **HSE Funding Allocations (Move Towards Personalised Budgets):**

Many young people with intellectual disabilities that finish secondary school are directed towards local adult day centres. While there have been considerable strides towards de-institutionalisation in recent years and more organisations are working towards community-based supports and services and supported employment, many of the "old fashioned" adult day centres are still in operation today.

Currently, HSE allocations are determined by a means test for people with intellectual disabilities who are receiving support from a Disability Support Service to attend day services and/or other similar support services. On average, a "typical" student that attends the Trinity Centre for People with Intellectual Disabilities (TCPID) educational course, would receive anywhere between €10k - €15k funding per annum. Currently, that funding goes directly to the support service that each of the individuals are registered with, despite being in (close to full-time) education and receiving minimal support from the services.

The introduction of the "Personalised Budgets" seeks to empower people with disabilities to take control of their own funding and have more choice and control over the services and supports they receive. However, the report from the Task Force on Personalised Budgets clearly states that Personalised Budgets *"does not, therefore, cover the areas of support currently funded by other Government Departments and agencies e.g. training, education, employment supports, housing supports etc."* (Dept. of Health, 2018)

An Taoiseach, Leo Varadkar spoke about the task force report saying,

*"People with disabilities should be afforded every opportunity to realise their potential. We must ensure that people with disabilities have the supports to achieve their life goals and this is a large part of what this Report is about."* (Varadkar, 2018)

It is the opinion of TCPID, that higher education is a potential support to achieving personal life goals for people with intellectual disabilities. Without core funding, education providers who are offering courses and access routes for people with intellectual disabilities, are struggling to sustain their enormous efforts to include people with intellectual disabilities in the higher education system.

### **Social Investment:**

People with intellectual disabilities want to work!

In order to level the playing field for people with intellectual disabilities to be considered for meaningful employment opportunities alongside their non-disabled peers, we need to ensure access to education and training to enhance the individual's skills.

*"We need training that will give us jobs at the end, not course after course in a workshop somewhere. We want to go to the same college's everyone else goes to, just with more supports and for jobs that we can do at the end"* (National Platform of Self-Advocates, 2018).

Maslow's Hierarchy of Needs suggests all people have needs that must be satisfied. Meaningful employment is an important step towards achieving self-actualisation. People have a need to feel secure, to feel a sense of belonging and to feel valued. (Maslow, 1943)

Paid employment for people with intellectual disabilities can have a direct and immediate impact on their self-worth and independence. To become a member of a working team; to have a say in decision making; to have responsibilities; to earn a living, these are all factors of employment not to be taken for granted.

*"Working in ~~xxxxxxxx~~ means everything to me. I love being part of society, getting a pay cheque, being able to grumble about having to pay taxes and being able to save money and being able to work off a budget."* (Anonymous Graduate Student of TCPID, 2017)

Typically, people with intellectual disabilities that do not access appropriate education and training tend to be:

- Placed in day services – [23,583 people attend day service] (NIDD, 2017)
- Unemployed – [Just 6% in paid employment] (NIDD, 2017)
- Increased risk of living in poverty (Watson, 2017)
- More dependent on social welfare (CES, 2015; MWP, 2018)
- Little expectation to progress to Higher Education - [0.145% in H.E.] (NIDD, 2017)

Investing in education and training of people with intellectual disabilities has the potential for a social return on investment in the long-term. Graduates of education and training programmes that enter into paid employment as a result, become taxpayers to the state and also become less dependent on welfare and decreases the day services spend (to say they would be completely independent of the support of the state through social welfare would be to dismiss the additional cost of living with a disability, which is not a reasonable assumption).

#### **Policy Context:**

Inclusive education programmes for people with intellectual disability are in line with and complement the following policies:

- Innovation 2020. Higher Education Authority (HEA)
  - Excellent research in strategically important areas that has relevance and impact for the economy and society.
  - A coherent joined-up innovation ecosystem, responsive to emerging opportunities, delivering enhanced impact through the creation and application of knowledge.
- Transforming Our World: The 2030 Agenda for Sustainable Development. United Nations (UN)
  - Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

31.08.2018

Trinity Centre for People with Intellectual Disabilities



- Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
  - Reduce inequalities within and among countries.
- Project Ireland, 2040. National Planning Framework (NFP)
- A strong economy supported by enterprise, innovation and skills.
  - Access to quality childcare, education and health services.

On behalf of Trinity Centre for People with Intellectual Disabilities, I would like to thank you for taking the time to consider our submission towards the update of the Higher Education Authority Act 1971.

Yours sincerely,

[Redacted signature]

[Redacted name]

Trinity Centre for People with Intellectual Disabilities,

[Redacted address lines]



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