

## Irish Council for International Students (ICOS)

### Consultation Submission 13/09/2013

QQI Comprehensive Policy Development Programme May 2013

#### SECTION 4.4 - Green Paper on International Education Mark (IEM)

Issue 1 - Should there be a single or multiple versions of the IEM?

Options:

**a. One version**

- **Single IEM for all relevant providers**

b. Two versions

- Further and higher education providers
- English Language Teaching (ELT) providers

c. Three versions

- Further education and training
- Higher education and training
- English Language Teaching providers

d. Multiple versions

- All of the above
- Publicly funded providers
- Private providers
- Providers with a track record in education and training/international education and training
- New Providers (Provisional/candidate status for IEM)
- Other

Comments:

Ideally, there should be one version of the IEM, at most two versions (one for HE and FE and one for English Language providers). There should be pathways to the IEM which take account of context of each provider and how it evaluates its own performance and demonstrates it has reached the standard. The process should be kept as simple as possible.

## Issue 2 - When should the IEM be made available?

### Options:

- a. All current providers that have transitioned to QQI as relevant providers and that self-certify their compliance with the Code of Practice should be authorised to use the IEM immediately.
- b. Relevant providers that have completed an institutional review process and that self-certify their compliance with the Code of Practice would be authorised to use the IEM immediately.
- c. Relevant providers reviewed under new QQI policies and that have had their compliance with the Code assessed by QQI, would be authorised to use the IEM pending a satisfactory outcome of such review and assessment.**
- d. A sub group of providers or type of provision, based on a risk assessment, would be authorised as early adopters of IEM to build brand reputation. For example, a sub-group could be that higher education and training providers would have access to the IEM for their post-graduate provision or recognised ELT providers specialising in English language provision. This would be in keeping with the approach of Enterprise Ireland which prioritises the promotion of the higher education and the ELT sectors to international students.

### Comments

The IEM should be made available as soon as possible. It has taken a long time to get this far while education providers of doubtful standard continue to operate freely which leaves students open to exploitation and Ireland's reputation as a quality education destination vulnerable.

There should be no automatic entitlement to the IEM as this would undermine its value. In the interest of fairness, the IEM should be made available to all provider types at the same time.

When planning the implementation of the IEM, careful consideration will need to be given to the potential impact on students already on courses in colleges which fail to attain the IEM. It must be anticipated that a number of providers currently appearing on the Internationalisation Register will not reach the quality standard required for the IEM. Since a college that can no longer recruit internationally may no longer be financially viable, those students already on programmes, or who have already financially committed to courses, risk becoming the big losers. Lessons must be learnt from the fallout experienced following the collapse of a number of private colleges in recent years and plans and resources put in place to protect current students who may find themselves the unintended victims of the failure of their colleges to achieve the IEM.

Issue 3a - Should all providers, including public providers, authorised to use the IEM be required to establish arrangements for the protection of enrolled learners under section 65 of the 2012 Act?

ICOS supports the inclusion of Protection of Learners, collection of fees from enrolled learners and tax compliance in the Code but some flexibility may be required regarding how this is demonstrated for example in the case of Study Abroad programmes which are offered by higher education institutions recognised in other jurisdictions. Public providers should have policies which show how learners are protected but there should be no requirement for bonding arrangements as with private providers. Publicly funded educational institutions now fall under the remit of the Ombudsman so students have this avenue for redress.

Issue 3b - Are the suggested areas set out above for inclusion in the Code appropriate? Are there other areas that should be included in the Code?

The suggested areas for inclusion in the Code are appropriate but not all may apply to individual institutions so some flexibility will be required.

Issue 3c - Are there other areas that should be included in the Code?

Care of minors (students under 18 years of age) There are many model Codes available in Ireland and internationally and these can be drawn on not least the IHEQN 2009 Code of Practice and Guidelines for Irish Higher Education Institutions, "Provision of Education to International Students". Coherence with European standards should also be a goal (ref ACA's document, "Support Services for International Students – towards a European code of good practice").

Issue 4 - What level of prescription and detail should be included in the Code of Practice?

- a. The Code should be based on high level principles
- b. The Code should be based on detailed criteria
- c. The Code should be based on a combination of high level principles and detailed criteria**

It is in HEIs own interests to make the Code as robust as possible and there should be some guidelines which assist HEIs to reach the quality standard required in a particular area and against which performance can be measured.

#### Issue 5 - How should QQI carry out a review of compliance with the Code?

- a. A review of compliance with the code should be a stand-alone review
- b. A review of compliance with the code should be integrated with other statutory reviews provided by QQI e.g. review of effectiveness of provider's quality assurance procedures
- c. A provider should be allowed to self-certify their compliance with the code
- d. External agencies and/or stakeholder groups (e.g., Irish Council for International Students, the Irish Naturalisation and Immigration Service, international students, foreign government representatives) should have a role in monitoring and review of compliance by a provider with the code of practice.**

A review of compliance with the Code should be integrated as far as possible with other statutory reviews. External agencies/stakeholder groups such as ICOS should be involved in monitoring and review processes.

#### Issue 6 - In which countries should the Code be applicable?

Given the restricted interpretation of an international student in the 2012 Act, should providers be restricted from using the code and the IEM in promoting their off-shore provision?

No

Should review of compliance with the code extend to the off-shore provision of relevant providers?

Yes. There should be no restriction on providers using the IEM in promoting their off-shore provision provided that any reviews of compliance are extended to include such provision.