



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

WHITE PAPER

Policy on Authorisation to use the International Education Mark

FOR CONSULTATION

This White Paper contains proposed QQI policy on Authorisation to use the International Education Mark, for public consultation and information. Following publication and consideration of the outcomes of consultation, this Paper will lead to Draft QQI Policy which is proposed for adoption by the Board of QQI. Once adopted, QQI policy and procedures are developed and implemented accordingly.

Policy set out in this White Paper will be supplemented by:

- » A Code of Practice for the provision of programmes to international learners.
- » General conditions in relation to authorisation to use the International Education Mark.
- » Specific conditions attached to authorisation for a specific group or class of provider.
- » Procedures for assessing the compliance of a provider with the Code of Practice.

QQI is seeking feedback from stakeholders on the policy contained in this White Paper.

Submissions may be emailed to
consultation@QQI.ie

The closing date for submissions
is **Friday 25 July 2014.**

In your submission please clearly indicate:

1. *Your contact details.*
2. *Whether you are responding as an individual or on behalf of an organisation.*
3. *If you do not wish your submission to be published.*

1 INTRODUCTION

Quality and Qualifications Ireland (QQI) was established in November 2012 by the Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act).

The 2012 Act sets out the functions of QQI which includes the establishment of a Code of Practice for the provision of programmes of education and training to international learners and to authorise the use of the International Education Mark by a provider that complies with the Code.

This document sets out the policy and criteria for providers of education and training programmes seeking authorisation to use the International Education Mark.

QQI policy is developed through a consultative process involving all stakeholders.

Details of the policy development process are available on www.QQI.ie.

The International Education Mark is intended to represent and promote public confidence in the quality of the educational experience delivered by education and training providers to international students in Ireland. Quality is understood as a comprehensive concept that includes academic provision and related student supports and also concerns the effectiveness of institutional strategies aimed at enhancing the international dimension of education afforded to all enrolled learners, international and domestic.

Many education and training providers compete in a global market to recruit and retain talented international students. Variation in policy and regulatory frameworks, trends in student and institutional mobility and innovation in ICT, present both challenges and opportunities for providers and for the policymaking process. It is in this context of increasing internationalisation of education and training that the International Education Mark is intended to inform and assure international students about the quality of the educational experience that they can and should expect.

1.1 THE LEGISLATIVE CONTEXT

The Qualifications and Quality Assurance (Education and Training) Act 2012¹ (Part 5 Section 60-63) establishes a statutory basis for the International Education Mark. Specifically the 2012 Act requires QQI to:

- » Establish a Code of Practice for the provision of programmes to international learners,
- » To specify an International Education Mark to indicate that a provider is in compliance with the code of practice and
- » To authorise the use of the International Education Mark by a provider who complies with the code of practice.
- » To review compliance by a provider with the Code of Practice and the use of the International Education Mark by a provider.

For the purpose of this policy an international learner is defined in accordance with the 2012 Act as *a person who is not an Irish citizen but is lawfully in the State primarily to receive education and training.*

1.2 PRE-CONDITIONS FOR PROVIDERS SEEKING AUTHORISATION TO USE THE INTERNATIONAL EDUCATION MARK

- » That the provider has established procedures for quality assurance under section 28 of the 2012 Act.
- » That the provider has established procedures for access, transfer and progression under section 56 of the 2012 Act.
- » That in respect of each programme of education and training of the provider which leads to an award, the provider has ensured that such an award is recognised within the National Framework of Qualifications where that award is capable of being so recognised. QQI will publish overarching policy on the recognition of qualifications within the Framework.

¹ Qualifications and Quality Assurance (Education and Training) Act 2012
<http://www.oireachtas.ie/documents/bills28/acts/2012/a2812.pdf>

Note. QQI has published Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards². Stage 1 of this policy sets out the statutory requirements for providers that do not have a current statutory relationship with QQI to establish procedures for quality assurance under Section 28 of the 2012 Act.

QQI policy on Re-Engagement with legacy Providers³ sets out the statutory requirements for legacy providers to establish QA procedures with QQI in accordance with either Section 29 or 30 of the 2012 Act.

The Schedule of fees determined by QQI in October 2013 includes *Fee for the submission of quality assurance procedures for approval in respect of new providers* Section 8o (a)⁴.

² Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards.
<http://www.qqi.ie/Quality/Pages/Initial-Validation.aspx>

³ Re-engagement with legacy providers: Overarching policy
http://www.qqi.ie/Downloads/Consultation/Docs%20March%202014/White_Paper-Re-Engagement_with_Legacy_Providersv1.2.pdf

⁴ The Schedule of fees determined by QQI in October 2013.
<http://www.qqi.ie/Quality/Pages/Initial-Validation.aspx>

2 POLICY CONTEXT AND BACKGROUND

Government policy on international education seeks to position Ireland as a destination for talented international students and that they can be assured of a high quality academic, social and cultural experience. The achievement of sustainable growth in high quality international education requires a policy and regulatory framework that is coherent, responsive and evidence informed.

2.1 INTERNATIONAL DIMENSION

International education is a global phenomenon and public policy and regulatory framework in Ireland must consider the various policy and regulatory approaches in other countries competing for talented international students. The International Education Mark is part of a wider national offering of quality academic, economic, social and cultural opportunities that aim to contribute to Ireland's reputation as a destination of choice for international students. Reputation in the context of international education is relative to and subject to international norms and benchmarks. The development of policy for the authorisation of the International Education Mark has been informed by national and international practice and standards. To establish and maintain the International Education Mark as an indicator of confidence in the quality of the student experience will require that the evolution of the International Education Mark continues to be informed by international trends, standards and expectations.

2.2 COHERENCE WITH GOVERNMENT STRATEGY

The development of this White Paper has been framed by public policy, in particular by *Ireland's International Education Strategy*⁵, and informed by submissions made in response to the public consultation on the Green Paper for the International Education Mark⁶. The International Education

5 Investing in Global relationships. Ireland's International Education Strategy 2010-2015 <http://www.educationinireland.com/en/publications/full-report-education-global-strategy.pdf>

6 Green Paper on The International Education Mark Published by QQI May 2013 <http://www.qqi.ie/Downloads/Consultation/Green%20Papers/Green%20Paper%20-%20Section%204.4.pdf>

Mark will be authorised for use by providers who can establish and maintain public confidence in the quality of education and training provision and related services offered to international students. This is clearly the position articulated in Government strategy for international education. The recent review of Government strategy⁷ reinforces the contribution of the International Education Mark to strengthening Ireland's reputation for quality. The National Strategy for Higher Education to 2030⁸ recognises that the internationalisation of higher education requires a long-term and sustainable process, based on high-quality, holistic and balanced engagement. The strategy identifies the International Education Mark as an important part of this process, particularly in terms of its potential to influence how international students make decisions on where to study.

2.3 PROVIDER INNOVATION AND TRENDS IN STUDENT MOBILITY

Trends in student and institutional mobility and paradigm shifting educational technologies challenge traditional assumptions about the patterns of student mobility and the location and nature of provision of educational programmes and services. The international dimensions of education contribute to and react to the process of globalisation. The diversity of institutional responses to the increasing internationalisation of education, both at home and abroad, require national policy responses to identify clear strategic needs. Equally it is important that policy can support and promote provider led innovation that enhances the educational experience for international students.

Submissions are published at:

<http://www.qqi.ie/Downloads/Section%204%20Green%20Paper%20Submissions%20Reportnov13.pdf>

7 Review of Ireland's International Education Strategy 2013. Department of Education and Skills. <http://www.education.ie/en/Publications/Policy-Reports/Public-Consultation-Review-of-the-International-Education-Strategy.pdf>

8 National Strategy for Higher Education to 2030. Department of Education and Skills. (pp80-84) <http://www.education.ie/en/Publications/Policy-Reports/National-Strategy-for-Higher-Education-2030.pdf>

3 PROVIDERS SEEKING AUTHORISATION TO USE THE INTERNATIONAL EDUCATION MARK

Relevant providers under the 2012 Act are eligible to apply for authorisation to use the International Education Mark. This class of provider includes:

- » A Designated Awarding Body (Universities, Dublin Institute of Technology and the Royal College of Surgeons in Ireland).
- » A Linked Provider of a Designated Awarding Body.
- » A Provider whose programmes are validated by QQI.
- » A Provider to whom authority to make awards has been delegated.

Section 61(6) of the 2012 Act makes provision for an additional class of provider, not listed above, that is treated as a relevant provider for the sole purpose of authorisation to use the International Education Mark. Providers in this additional class include voluntary providers⁹ who do not offer programmes leading to QQI awards or providers who offer programmes that do not lead to awards such as English language courses that are accredited under the ACELS (Accreditation and Coordination of English Language Services) scheme. English language teaching organisations that have voluntarily achieved accreditation under the ACELS scheme will be required to become relevant providers under the 2012 Act for the purpose of accessing the International Education Mark.

Providers that establish a quality assurance relationship with QQI for the sole purpose of authorisation to use the International Education Mark will be expected to satisfy comparable requirements relating to application, monitoring and review that apply to any other relevant or linked provider authorised to use the International Education Mark.

⁹ QQI's role as an external QA agency is dependent upon a QA approval process which providers may or may not choose to engage in, this is what makes them voluntary providers.

3.1 CONDITIONS

Under Section 61(8) of the 2012 Act, QQI will specify general conditions in relation to authorisation to use the International Education Mark. Such conditions will refer to how providers and QQI will cooperate in the performance of QQI functions that relate to the Code of Practice and authorisation to use the International Education Mark. QQI may specify any other conditions it thinks appropriate in relation to the International Education Mark, including specific conditions for an individual provider or class of providers.

4 THE CODE OF PRACTICE FOR THE PROVISION OF PROGRAMMES OF EDUCATION AND TRAINING TO INTERNATIONAL LEARNERS

QQI will determine an application from an eligible provider seeking authorisation to use the International Education Mark by assessing the compliance of the provider with a Code of Practice for the provision of programmes to international learners. The development of the draft Code of Practice has been informed by norms and standards developed by the Irish Higher Education Quality Network¹⁰ for higher education and training providers and by ACELS¹¹ standards and regulations for English language teaching providers. The draft Code of Practice will be informed by similar initiatives that have been introduced in other countries.

QQI will publish a draft Code of Practice to include principles and guidelines relating to supports and services available to international students. By signing up to the Code of Practice, providers will commit to delivering a high quality student experience to international students, before, during and after their enrolment as a student with the provider.

See *Appendix 1* for indicative content of the Code of Practice.

4.1 COMPLIANCE WITH THE CODE OF PRACTICE

Effective Codes of Practice are typically clear, relevant, provide specific examples and guidance, are developed collaboratively with those required to implement them, supported by effective monitoring of compliance and fair and consistent treatment of breaches. The effect of the Code of Practice associated with the International Education Mark will be determined by how it is supported and implemented by providers and how it is seen to be implemented. Ultimately, international students will judge the

¹⁰ Provision of Education to International Students: Code of Practice and Guidelines for Irish Higher Education Institutions (IHEQN) http://www.iheqn.ie/fileupload/File/IHEQN_62439738.pdf

¹¹ ACELS Regulations for Recognised English Language Teaching Organisations <http://www.acels.ie/schoolsregulations.htm>

effectiveness of the Code of Practice and how it has been implemented by providers. Providers will be expected to demonstrate the effectiveness of their policies and procedures for the provision of education and training programmes and related services and supports to international students.

4.2 EDUCATION AND TRAINING PROVISION COVERED BY THE CODE OF PRACTICE

Providers authorised to use the International Education Mark will be expected to apply the Code of Practice to all of their provision offered to international students.

4.3 INTERNATIONAL EDUCATION MARK – BRANDING

The International Education Mark as a statutory mark may include such words as QQI decides subject to the agreement of the Minister. Any such wording and associated visual emblems or logos will communicate the purpose of the International Education Mark, essentially signalling confidence in providers of education and training programmes to international students.

QQI will be the proprietor of the International Education Mark and authorise its use by a provider under the seal of QQI.

QQI will issue guidelines on the use of emblems or logos and communications protocols for providers in relation to the use of the International Education Mark.

4.3.1 *International Education Mark - Promotion*

QQI will develop and implement a branding and promotion strategy for the International Education Mark. The initial objective of this strategy will be to establish awareness and understanding of the International Education Mark among relevant stakeholders.

Authorisation to use the International Education Mark will be a condition for providers wishing to access national marketing and promotion supports. The existing *Education in Ireland*¹² brand supported by Enterprise Ireland will continue to play a central role in promoting awareness of Ireland as a destination for international students to the benefit of providers authorised to use the International Education Mark.

¹² Education in Ireland <http://www.educationinireland.com/en/>

5 IMPLICATIONS FOR THE EXISTING ACELS SCHEME

The existing ACELS scheme operated by QQI will be discontinued. QQI will implement a new statutory quality assurance scheme for English language teaching organisations. QQI will issue quality assurance guidelines and programme conditions for the accreditation of English language teaching organisations and associated programmes. Quality assurance guidelines and conditions will build on the existing ACELS standards that have been developed in association with the ELT sector.

Providers of English language courses that do not have programmes leading to awards made by QQI may wish to apply for authorisation to use the International Education Mark under Section 61 (6). Existing providers accredited by ACELS and interested in applying for authorisation to use the International Education Mark will establish procedures for quality assurance under Section 28, apply relevant programme related conditions and demonstrate compliance with the Code of Practice. There will be no automatic transition from the existing ACELS scheme to the International Education Mark.

Maintaining a recognisable quality assurance scheme for English language teaching is consistent with Government strategy for international education and with international practice.

QQI intends to maintain an identifiable brand for the new statutory scheme for the accreditation of English language teaching organisations.

6 WITHDRAWAL OF AUTHORISATION TO USE THE INTERNATIONAL EDUCATION MARK

Providers have an interest in contributing to confidence in and the integrity of the International Education Mark. It is recognised that many providers have implemented programme provision and academic and pastoral supports for international students that may exceed the requirements proposed in association with the International Education Mark.

Achieving and retaining authorisation to use the International Education Mark will be conditional on a provider's capacity to effectively demonstrate the quality of the educational experience offered to international students.

The 2012 Act requires that QQI shall withdraw a provider's authorisation to use the International Education Mark in cases where:

- » QQI considers that the provider **no longer complies with the Code**.
- » QQI considers that a **condition** imposed in relation to the operation of the International Education Mark, **is not being complied with** by the provider.
- » QQI has **withdrawn the approval of quality assurance procedures** established by a relevant provider.
- » A designated awarding body has **withdrawn the approval of quality assurance procedures** established by a linked provider.
- » QQI has **withdrawn the approval of access, transfer and progression** procedures established by a relevant provider.

7 FEES AND CHARGES ASSOCIATED WITH THE INTERNATIONAL EDUCATION MARK

The 2012 Act makes provision for fees and charges associated with authorisation to use the International Education Mark.

Fees and charges related to the International Education Mark will have regard to the costs associated with:

- » Maintaining and developing the Code of Practice.
- » Promoting the International Education Mark.
- » Maintaining the integrity, on an on-going basis of the Code of Practice, and the International Education Mark, in particular by ensuring that the International Education Mark is used only by providers who are authorised to do so.

Providers seeking authorisation to use the International Education Mark may be subject to the following fees and charges:

- » An initial application fee payable with application. Where appropriate, the application fee will be included in fees charged by QQI in relation to the establishment of quality assurance procedures.
- » An annual charge. The annual charge will comprise a flat rate element and a variable element having regard to the number of international learners enrolled and the duration of programmes of education and training provided to international learners. The annual charge for the use of the International Education Mark is payable on or before the anniversary date of its authorisation.
- » A fee in relation to review of provider compliance with the Code. Where appropriate this fee will be included in fees charged by QQI for any other related review of a provider carried out under the 2012 Act. The review fee is payable within one month of the completion of the review.

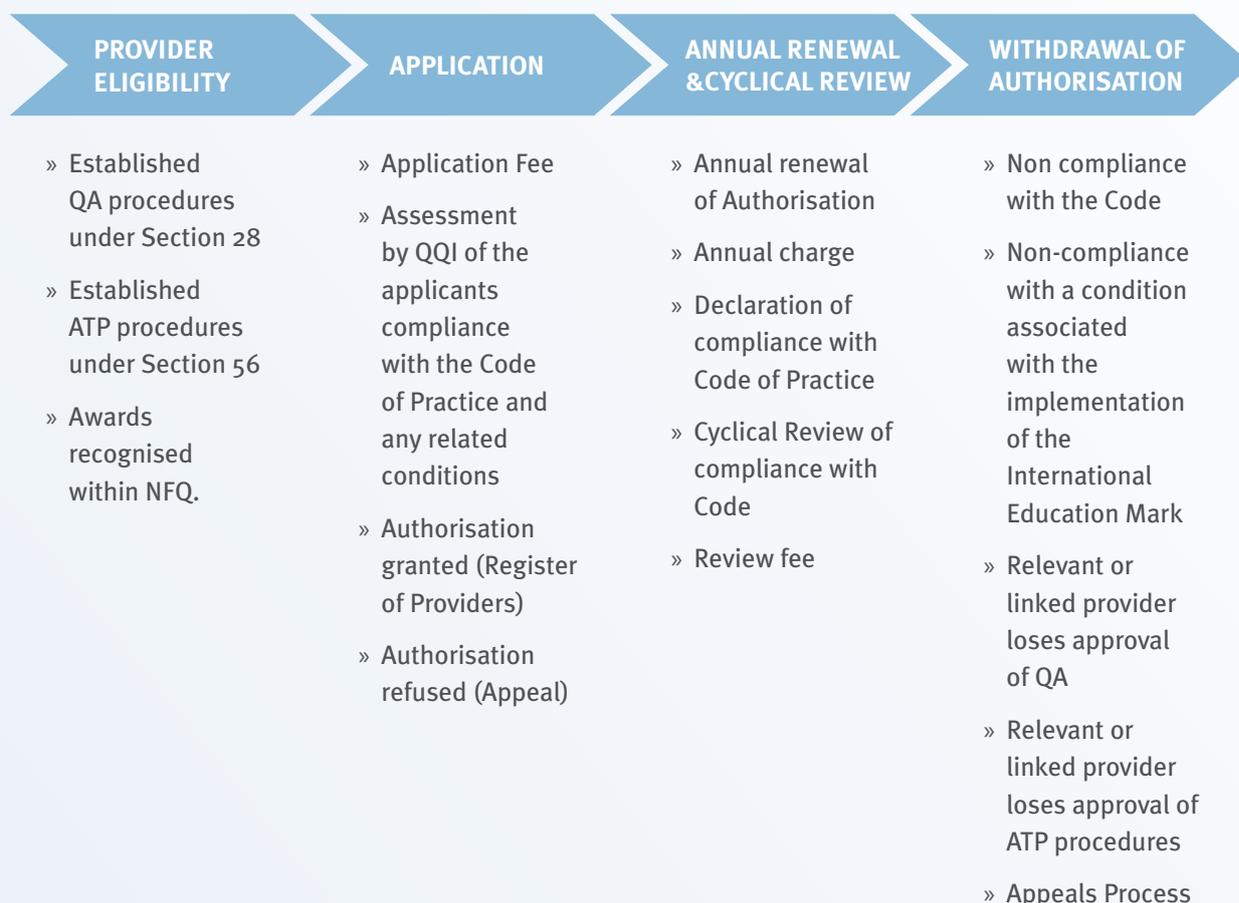
Fees and charges associated with authorisation to use the International Education Mark will be set in accordance with the principles and policy on Fees for QQI Services¹³

¹³ Fees for QQI Services http://www.qqi.ie/Downloads/QQI_QP_04_Policy_Document_Fees.pdf

8 PUBLIC INFORMATION ON PROVIDERS AUTHORISED TO USE THE INTERNATIONAL EDUCATION MARK

QQI maintains a public Directory of Programmes and Awards. This directory will indicate whether a provider of a programme is authorised to use the International Education Mark.

9 AUTHORISATION PROCESS



QQI will open applications for authorisation to use the International Education Mark by different education and training sectors. The sequencing of the application process will be determined by the education and training sectors that are identified as strategically important in Government strategy for International Education. The establishment of a statutory accreditation scheme for providers of English language teaching will be prioritised by QQI.

Programmes such as English language and foundation programmes are designed for delivery exclusively to international students. Other types of provision available to international students should have appropriate national diversity among student cohorts. Providers seeking authorisation to use the International Education Mark will be required to demonstrate a minimum of five years experience in the delivery of high quality education or training outcomes to domestic, including European students.

10 REVIEW OF A PROVIDER'S COMPLIANCE WITH THE CODE AND USE OF THE INTERNATIONAL EDUCATION MARK

QQI may at any time review compliance by a provider authorised to use the International Education Mark with-

- (a) The Code of Practice.
- (b) Conditions imposed by QQI in relation to International Education Mark authorisation.

In carrying out such a review, QQI will have regard to any other review of the provider carried out under the 2012 Act, where that review is relevant to the International Education Mark.

English language teaching organisations authorised to use the International Education Mark will be subject to a review of such authorisation at least once every 3 years.

11 DECISION, REVIEW AND APPEALS PROCESS

Part 7 of the 2012 Act provides for appeals procedures. Providers may appeal if QQI:

- » Refuses to authorise the use of the International Education Mark.
- » Withdraws a provider's authorisation to use the International Education Mark.

Providers informed by writing that QQI proposes to withdraw their authorisation to use the International Education Mark, may submit written observations to QQI in relation to the proposed withdrawal.

12 REVIEW

This policy will be reviewed two years after the date of adoption by the Board or earlier if necessary.

QQI may amend or revoke the Code of Practice at any time.

APPENDIX 1

CODE OF PRACTICE – INDICATIVE CONTENT

Marketing and Recruitment

- » *Provision of Information to learners*
- » *International Student Recruitment*
- » *Use of Agents*

Finance: Fees, Refunds, Subsistence

- » *Tax Compliance*
- » *Tuition and tuition related fees*
- » *Refund Policy*
- » *Protection of enrolled learners*
- » *Service costs*
- » *Immigration related costs and fees*
- » *Subsistence and Maintenance costs*

Student Welfare

- » *Student Supports*
- » *Equity of treatment*
- » *Hardship and Emergency*

Integration and Cultural Awareness

- » *Pre-Arrival Stage*
- » *Induction and Orientation*
- » *Student Supports*
- » *Student Activities*
- » *Staff Development*
- » *Student Representation*
- » *Student Accommodation*
- » *Off campus learning and/or work experience*
- » *Post enrolment and alumni services*

Academic Support

- » *Academic requirements*
- » *Access Programmes*
- » *English Language requirements*
- » *Admissions procedure*
- » *Enrolment procedure*
- » *Educational and Academic culture*

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