

Election Manifesto 2020



January 2020

About the Irish Council for International Students (ICOS)

This election manifesto is by the Irish Council for International Students (ICOS). ICOS is an independent advocacy organisation whose mission is to protect the rights of international students, and to contribute to a healthy and vibrant international education sector in Ireland which has the quality of the student experience at its centre.

ICOS has more than thirty institutional members, including all nine universities in the Republic of Ireland, many of the Institutes of Technology and all the major independent third level colleges. Our membership also includes the Union of Students in Ireland (USI).

ICOS' values include consultation, professionalism, collaboration and learning, and our goals are to influence policy and standards in international education; build the capacity of our members; empower international students to pursue their rights; and support and showcase the important contribution of international education to international development.

Introduction

International students play an important role in Irish society. Their impact on Irish education is hard to measure on the whole, but economically it has been estimated at over €1.5bn with the stated intention to grow to over €2bn by 2020.

It is easy to measure the economic impact, but the benefits go beyond mere financial ones. In today's globalised world, academic and social interaction with students from around the world can be enormously beneficial. Forbes states that having international students on campus, provides our students with not just educational benefits, but also career benefits¹.

Despite their importance, international students are a low political priority and have no vote themselves, except for the local elections. ICOS believes that all individuals residing in Ireland should be considered in the same vein, with their economic, social and health rights considered.

In this submission, ICOS has considered not just the educational considerations for international students and has taken a holistic approach to considering all aspects of student life in Ireland.

The current strategy for International Education² in Ireland is due to expire during the term of the next Government and ICOS urges the incoming Minister for Education to ensure that strategy focuses as much on the rights and welfare of international students as it does on their financial importance.

¹ Marvin Krislov - Why International Students Are Good For Colleges, Universities And America. Forbes, March 22nd 2019

² Irish Educated, Globally Connected 2016 - 2020

ICOS Election Manifesto

Irish Council for International Students

ICOS is the Irish council for International Students. We promote the rights and voice of international students in Ireland. For the General Election 2020, we ask that candidates consider:

Affordable Student Accommodation



International Education Mark



Universities of Sanctuary



Mental Health Services



Student Insurance



The Public Sector Duty



Employment Pathways



Immigration Reform



Hate Crime legislation



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BUILD AFFORDABLE STUDENT ACCOMMODATION

The acute national housing crisis that has affected so many people, and which continues to do so, has also greatly impacted on international students.

In recent times, a popular misconception has developed suggesting that all international students coming to Ireland to study are wealthy and can easily afford to pay exorbitant rents, be it in the private rental market or at high-end student residences. This idea, however, does not ring true and masks the reality that international students, like their Irish peers, are from all walks of life, and while some are able to afford to pay high rent rates, the majority cannot.

The present lack of suitable and affordable student accommodation has added an undue burden onto the shoulders of international students, who already face a myriad of challenges when coming to study in Ireland – adapting to a new culture and way of life, language issues, etc. International students are also more vulnerable when it comes to accommodation as they often arrive to Ireland with little knowledge of the rental market landscape, meaning they run a higher risk of being scammed or exploited.

The introduction of rent freezes in pressure zones means that student accommodation cannot increase more than 4% in a year; however, there were reports³ of huge increases in rents ahead of these freezes, in effect absorbing any benefit to students. Those reports state that the cost of private purpose-built student accommodation in Dublin rose by between 10 and 15 per cent over the past year⁴, and this statistic is borne out through ICOS' advocacy work.

Additionally, an annual 4% increase could mean as much as an additional €500 per annum for students, which may push the accommodation out of a student's price range. ICOS asks that a rent freeze be considered as part of any strategy to address the housing shortage, particularly in rent pressure zones.

ICOS calls on government to significantly increase efforts to provide more suitable student accommodation that is affordable and accessible to all, including international students. Additionally, a revised 'National Student Accommodation Strategy' should be developed with consultation of all students, including international students, in order to assess the full scale of the housing crisis among students.

ICOS asks:

1. Consult on and publish a revised 'National Student Accommodation Strategy'
2. Build more houses both in urban and rural areas in order to release the overall cost of renting.
3. Consider freezing rents until sufficient housing supply is restored.

³ The Irish Times, Wednesday August 7th 2019

INTRODUCE THE INTERNATIONAL EDUCATION MARK

In July 2019, after a long wait, ICOS warmly welcomed the enactment of the Qualifications and Quality Assurance (Education and Training) (Amendment) Bill 2018 as a very significant development in international education.

That new law would see tighter regulations for providers of English Language and Higher Education programmes to international students. The new law would also provide for a new national 'Learner Protection Fund' which will offer greater protections to students in the event of sudden school closures or the cessation of specific learning programmes.

The International Education Mark (IEM), if implemented, would mean that international students could now come to Ireland with greater reassurance that they will be protected, and the mark would ensure that only providers that meet the highest standards would be allowed to offer programmes to international students.

This mark is particularly important as the only quality control mechanism for English Language schools in Ireland is the 'Accreditation and Coordination of English Language Services (ACELS)', which is a legacy function of Quality and Qualifications Ireland (QQI) and no longer open to new applications. Although having ACELS accreditation can provide international students with some reassurances about a school, it does not offer security and in fact there are schools operating well in Ireland who cannot apply for ACELS because the system is closed. This dual-track approach to quality control is not sufficient and the IEM will address much of this concern.

ICOS is concerned that without the provision of adequate resources, the commencement of the legislation and introduction of the relevant measures will not occur in a timely fashion and may take years to commence.

ICOS urges the incoming Minister for Education to ensure that adequate resources are put in place to ensure that the codes of practice for the new mark can be developed and the staffing required to process the mark are put in place.

ICOS asks:

1. Resources are made available to commence the International Education Mark, and a timeline be established for its full implementation by the end of 2020.
2. The Learner Protection Fund is established without delay.

FUND UNIVERSITIES OF SANCTUARY

Universities of Sanctuary provide a safe and welcoming environment for students seeking protection in the Irish state to achieve higher education. At present, seven Irish higher-level institutions have been designated “Universities of Sanctuary”. To achieve this status, HEIs must provide education for staff and the student body on issues facing those fleeing persecution, take positive action to maintain a culture of welcome in the institution and share their vision and achievements in the area with other colleges and the wider community. So far, Dublin City University, National University of Ireland Galway, University College Cork, University College Dublin, University of Limerick have obtained the status, with Maynooth University due to receive designation in February 2020. Athlone Institute of Technology being designated a College of Sanctuary.

The HEIs provide *Sanctuary Scholarships* to asylum seekers and to those who have been granted refugee status. These scholarships are life changing for the most vulnerable members of Irish society, including those in the Direct Provision system. They encourage integration into Irish society and improve job prospects for those who have been granted the right to remain in Ireland.

Universities are, on the whole, responsible for the costs associated with offering Sanctuary Scholarships with philanthropic donors or alumni funds used to underwrite the programmes. The State must do more to support these important scholarships.

Students receiving a scholarship can also be persistently threatened with the prospect of deportation and, since 2016, four students on Sanctuary Scholarships have been issued with deportation orders. Most recently, a Sanctuary Scholar at UCC faced an uncertain future, with the possibility of a “transfer” to the UK under the EU’s Dublin Regulation. Following a public out-cry, including a petition, the Minister for Justice and Equality intervened to postpone the deportation, pending review.

ICOS believes Universities of Sanctuary are an important measure to ensure that refugees and asylum seekers in Ireland achieve meaningful education and should receive more support from the State in both their funding and administration. The government should adopt a policy of non-deportation for individuals in receipt of scholarships, and their families.

ICOS asks:

1. Financial support should be provided to expand the Sanctuary Scholarship programmes.
2. Government should adopt a policy so that all students in receipt of a Sanctuary Scholarship, and their families, are exempt from deportation orders for the duration of their studies.
3. Government should treat refugee and asylum seekers in Ireland as EEA citizens for the purpose of third level education fees.

IMPROVE MENTAL HEALTH SERVICES

There is a crisis in the Irish mental health system and this crisis has been felt acutely by the student population. The number of students seeking help from college mental health services has doubled since 2010⁵. A Union of Students in Ireland (USI) survey found that 38.4% of students are experiencing severe levels of anxiety. Anxiety related disorders account for over half of the referrals to campus mental health services. The survey also found that almost 30% of students suffer from depression, with 17.3% of respondents indicating that they experience high levels of stress. There has also been an increase in the number of students presenting with pre-existing mental health issues and in those who have attempted suicide in the years before commencing their third level studies.

In line with this trend, there has been a notable increase in the number of non-Irish students requesting counselling. International students are now more likely than their Irish peers to seek help for mental health issues. As well as financial and academic pressure, international students face additional problems likely to cause anxiety and depression; notably culture shock, homesickness, isolation, racism and language barriers.

In 2015, an HSE/ReachOut Ireland report highlighted that one-to-one counselling was the most frequented on-campus service by students seeking mental health support. The recommended ratio of counsellors per student is 1 to every 1,000/1,500. The average ratio across the Irish HEIs is 1 to 2,600 students⁶.

Given the shortage of counsellors on Irish campuses, the government needs to more to ensure that the HEIs can meet the needs of their students. Workshops on the area of wellness, mindfulness and managing stress levels are also in dire need.

ICOS asks:

1. Financial support must be given to the HEIs in order for them to improve their mental health services, assess the quality of these services and increase their capacity to support students who face difficulties.
2. Conducting a mental wellness campaign aimed at students to include media, social media and workshops run by mental health experts through experience.

⁵ Figures from Psychological Counsellors in Higher Education Ireland (PCHEI) report 2018

⁶ ibid

REFORM STUDENT INSURANCE LEGISLATION

It is an immigration requirement for non-EEA students to hold medical insurance in order to ensure that they are not a burden on the State; however, a recent Health Insurance Authority (HIA) decision has meant that specific insurance products that have been available to international students may no longer be available.

The HIA decision means that students studying in Ireland on courses of more than one academic year are considered "ordinarily resident", and required to purchase 'community-rated' products instead of the current product.

ICOS believes that this is unfair because:

- Unlike the rest of the population, international students would have no option but to purchase community-rated health insurance.
- Community rating is designed to ensure non-discrimination in a population over time. Most international students will not reside in Ireland long enough to benefit from community rating.
- International students are not being treated in the same way as other temporary residents, such as temporary workers.
- Up to 30,000 students who are currently in Ireland are at risk of significantly increased insurance costs. This includes many English Language Students, who may not have the means to deal with a significant increase.
- Insurance products currently used by students go beyond health and also include repatriation. There is no like-for-like product available through community-rated health insurance, meaning that students are likely to have worse cover than at present.

ICOS believes that this additional cost could be a significant disincentive to international students who choose Ireland as a study destination. Irish educational institutions are increasingly reliant on international student fees to maintain their high standards of education, but more importantly ICOS is of the view that international students and interculturalism is a good thing for Ireland and Irish education.

ICOS asks:

- I. ICOS, as part of the Alliance for Affordable Insurance for International Students (AAIIS), calls for a legislative response to this issue.

IMPLEMENT THE PUBLIC SECTOR DUTY

The public sector duty originated in Section 42 of the Irish Human Rights and Equality Act 2014. The Duty places a responsibility on all public bodies in Ireland to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans.

The duty places State bodies and the public sector under positive duty to promote equality for migrants in accessing state services. This duty also applies to international students in Ireland.

Universities and institutes of technology have obligations under the duty and, considering the large percentage of international students on Irish campuses, it provides a necessary safeguard on equality and rights. The Irish Human Rights and Equality Commission (IHREC) has worked with University College Cork as a part of 6 pilot projects and, following the pilot, the duty has now made it into the college's self-assessment process and has led to several positive developments across all grounds, including race.

ICOS' encourages the incoming government to ensure appropriate funding is made available for all Universities and Institutes of Technology to fully embed the Duty in planning and annual reporting to ensure its roll-out across all campuses.

Additionally, as public bodies, government departments are required to have regard to the public sector duty in all activities and should include their planned actions in their strategy statements.

The majority of government departments simply note their obligations and the development of new departmental strategies following the election and appointment of new government ministers provides an opportunity to advance departmental commitments under the Duty.

ICOS asks:

1. Each government department makes a full commitment to the public sector duty and references its application in their strategy statements.
2. Ensure that services, such as INIS, are fully accessible to all audiences, including those for whom English is not a first language.
3. Ensure that complaints and redress measures are accessible.
4. Equality-proofing all departmental policies and procedures to ensure non-discrimination.
5. Holding consultations with international students and other migrants.
6. Ring-fence funding for HEIs to build on the public sector duty demonstration projects.

DEVELOP EMPLOYMENT PATHWAYS FOR INTERNATIONAL STUDENTS

Recently announced reforms in Britain mean that international students looking for work can remain for up to two years after they graduate. This is up from 4 months and puts them ahead of Ireland where only Level 9 graduates may remain for 24 months and Level 8 for 12.

Other English – speaking jurisdictions allow graduates to remain for up to three years such as Australia, Canada and New Zealand.

Employment opportunities could be expanded for international graduates of Irish higher education institutions (HEIs) by expanding the current third level graduate scheme (stamp IG) to allow graduates to remain in Ireland for a period of up to three years.

ICOS also calls on the government to introduce a new pathway for skilled international graduates of Irish HEIs after their stamp IG permission expires to remain in Ireland for a further 2 years if they are working full time in an area that corresponds to their area of studies. A similar scheme has been introduced by the Government of Western Australia as part of the *Skilled Work Regional (Provisional) subclass 491 visa*, which provides opportunities for international graduates who studied in Western Australia to remain for up to 5 years.

According to the HEA's *Graduate Outcomes Survey: Class of 2017*, 9 months after graduation 74% of international graduates of Irish HEIs were in employment, and 62% of these were employed in Ireland. This means that just 45% of international graduates remained in Ireland to work. ICOS believes that more needs to be done to retain the talent and skills of international graduates, and that increasing the opportunities for graduates to build their careers in Ireland and simplifying the immigration pathway for them to do so are essential.

ICOS asks:

1. Conduct a review of Stamp IG to bring Ireland in line with progressive, English-speaking jurisdictions.
2. Introduce a pathway for highly-skilled international graduates to ensure that Ireland retains much-needed skilled workers.

IMMIGRATION REFORM

Obtaining an appointment with immigration can be an unnecessary stress that international students face when choosing to study in Ireland. Through our advocacy work, ICOS has seen the great difficulties facing international students, particularly those living in Dublin and Cork, to secure their appointment to register with the immigration services.

Since 2016, the Irish Naturalisation and Immigration Service (INIS) has operated an online appointment system to register and renew visas of non-EEA nationals living in Dublin. ICOS has received reports of problems and inefficiencies, leading many frustrated international students to pay third-party operators to secure an immigration appointment for them⁷. While INIS warn of the dangers of handing over sensitive details to unknown entities, the lack of available appointments has left many people feeling they have little choice but to use these unverified, unofficial services. Outside of Dublin, the Garda National Immigration Bureau (GNIB) operate a ticketing system which has also been fraught with problems. International students are often required to queue for hours just to get an appointment to attend weeks later⁸.

ICOS is aware that efforts are already underway to improve the immigration appointment system; however, this alone will not address the current resource deficiencies, as both INIS and GNIB are already at full capacity. In 2018, 142,924 people from non-EEA countries were registered as living in Ireland (an increase of 12% on 2017 figures)⁹. With these numbers expected to increase in the coming years, it is imperative that we have a quick and efficient immigration service in place.

In 2019, a well-known student recruitment agency closed-down leaving dozens of international students stranded in Ireland and out of pocket. ICOS has seen a worrying increase in the number of international students seeking assistance in relation to disputes with these providers. Despite working closely with many English language schools and higher education institutes, these agencies currently operate unregulated.

ICOS asks:

1. ICOS believes that there is an urgent need for government to invest in new infrastructure to meet immigration demand.
2. A new streamlined appointment system must be developed for all of Ireland's cities.
3. The expansion of the postal renewal system for international students should be available to students across Ireland.
4. The inclusion of student recruitment agencies on the ILEP.
5. A complete Plain English review of INIS policy documents to make them more accessible.
6. Definitive timeline for roll out of new INIS website.

⁷ The Irish Times Wed, Dec 18, 2019.

⁸ The Echo Thur, Oct 19, 2019

⁹ INIS Statistics 2018

INTRODUCE HATE CRIME LEGISLATION

Over the last two decades, Ireland has undergone a massive transformation to become a highly diverse and multi-cultural society. While the majority of Irish people welcome and embrace the changes that have taken place, there are some who view these changes less positively, and a small minority who completely oppose them, and are willing to act with intolerance, discrimination and even violence.

Ireland currently does not have any hate crime legislation to address racially incited crimes, and the limited hate speech legislation that exists is outdated and unsuitable to deal with the types of hate speech that are being propagated in today's society.

The lack of legislation and effective mechanisms to deal with both hate crime and hate speech lead many of these incidents to go unreported. ICOS calls on government to enact hate crime legislation to protect people from discrimination and to tackle individuals and groups that perpetrate acts of hate.

Ireland has been urged by Verene Shepherd, UN rapporteur on the elimination of racial discrimination in Ireland, to introduce hate crime legislation and she has called for a "clear time-bound commitment" to make the necessary changes in law.¹⁰

Recent consultations carried out by the Department of Justice was a positive move and in ICOS's submission as part of that consultation, we called for

ICOS asks:

1. Introduce reformed hate speech legislation, including provision to protect individuals from hate speech, on and off-line.
2. Develop a hate speech strategy, framework, and codes of conduct for social media providers and users.
3. Renew the National Action Plan against Racism.

¹⁰ The Irish Times Mon, Dec 2, 2019.

CONCLUSION AND RECOMMENDATIONS

ICOS stresses the important part that international students play in the health of Irish campuses and wider society, and urges the incoming government to consider the impact of its policies on this group, who are themselves without a vote in this election.

The impact of Brexit has yet to be fully appreciated and when Ireland is one of the only remaining English-speaking nations in the EU, there is a significant opportunity to grow our international student population. To do this however, the conditions must be right.

Expensive accommodation and insurance, growing incidents of hate crime, insufficient health and mental health services, and inadequate pathways to work all have the potential to undermine Ireland's progress. Initiatives such as the International Education Mark and Universities of Sanctuary have the potential to improve our reputation abroad.

A summary of ICOS's recommendations is below;

1. Revise the 'National Student Accommodation Strategy'
2. Build more houses both in urban and rural areas in order to release the overall cost of renting.
3. Build affordable student accommodation
4. Consider a rent freeze.
5. Commence the International Education Mark and establish the Learner Protection Fund.
6. Support and expand the Sanctuary Scholarship programmes.
7. Refugees and asylum seekers in Ireland should be treated as EEA citizens for the purpose of third level education fees.
8. Improve mental health services and conduct a wellness campaign aimed at students.
9. Reform the anomaly affecting international student insurance.
10. Each government department makes a full commitment to the public sector duty and references its application in their strategy statements.
11. Ring-fence funding for HEIs to build on the public sector duty demonstration projects.
12. Conduct a review of Stamp 1G to bring Ireland in line with other progressive, English-speaking jurisdictions.
13. Invest in new infrastructure to meet immigration demand throughout the country, particularly in Dublin and Cork.
14. A new streamlined immigration appointment system must be developed for all of Ireland
15. The inclusion of student recruitment agencies on the ILEP
16. Introduce reformed hate speech legislation, including provision to protect individuals from hate speech, on and off line.
17. Renew the National Action Plan against Racism.

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