



**Submission to the Department of Further
and Higher Education, Research,
Innovation and Science on its Statement
of Strategy 2021 - 2023**

December 2020

About the Irish Council for International Students (ICOS)

The Irish Council for International Students (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. 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.

About this submission

ICOS welcomes the opportunity to make a submission to the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) on its Statement of Strategy 2021 – 2023. As part of its own consultation for this submission, ICOS engaged with its members and international students by conducting a survey to gather their views on the main challenges facing the higher education sector in the context of international students. The feedback from the survey has been incorporated and forms the basis of this submission.

Introduction

The announcement of a Minister for Further and Higher Education, Research, Innovation and Science earlier this year was warmly welcomed by everyone involved in the higher education sector. However, the scope, work, and priorities of the newly formed Department of FHERIS has up until now yet to be defined. In light of this, the development of a Statement of Strategy represents an important opportunity for the Department to set out its role in all areas of higher education and research and define its strategic goals.

ICOS hopes that the Department will take into consideration the challenges facing international students, as well as the higher education sector, which are highlighted in this submission and make a firm commitment to addressing them through their inclusion in the Statement of Strategy. ICOS also believe that the Department should use their Statement as a platform to feed into Ireland's new Internationalisation Strategy which is due for renewal in 2021.

The Role of the Department

The relationship between the DFHERIS, QQI, and the Department of Education should be outlined in the Statement of Strategy to avoid ambiguity. Moreover, there needs to be a greater holistic approach across government to ensure that strategic objectives of one area of policy are not being undermined by another. This is particularly evident in immigration policy where there seems to be an under-appreciation of the importance to the higher education sector of attracting international students to Ireland which requires a smooth and efficient immigration process. ICOS is regularly contacted by international students who feel they have been unfairly or harshly treated by immigration. Similarly, the Health Insurance Authority's decision to increase medical insurance for international students living in Ireland for more than 1 year completely undermines the higher education sector's ambitions to attract international students to these shores.

While these issues may not be directly within the remit of DFHERIS, they affect the higher education sector, and therefore ICOS feels it is important to stress the need for greater inter-departmental collaboration across government which could be outlined in the Statement.

Funding

The higher education system is grossly funded in Ireland. Without significant investment, the quality of the sector is at risk. ICOS urges the Department to set out a clear funding pathway for higher education and to implement the recommendations of the Cassells Report, including increasing core funding for the sector to €2.8 billion by 2030. Investment in the sector must be effective and more needs to be done on course cost regulation and improving the performance management framework and funding mechanisms.

International offices in many institutions are under-resourced and under-staffed – there is a need for dedicated funding for colleges in relation to international students' supports. International students face unique challenges and if we are to increase the number of international students in Ireland, there must be a corresponding funding increase. International students act as ambassadors for Ireland and the reputation of our excellent education system needs to be upheld by investing in course quality, infrastructure and student supports. The next international education strategy needs to include clear funding plans for international education in Ireland.

Accommodation

Ireland's ongoing accommodation crisis is well documented. The lack of suitable and affordable student accommodation has added an undue burden onto the shoulders of international students. Indeed, international students are one of the most vulnerable groups of falling victim to scams or having to live in dangerously overcrowded conditions.

In April 2020, ICOS conducted a survey of 1,626 international students which at the time revealed the concerns that many students had about their precarious living conditions in the face of the Covid-19 pandemic. Worryingly, 46 per cent of English-language students reported sharing a room with three or more people, while 11 per cent of respondents shared with six or more people.

Affordable student accommodation represents the biggest challenge facing international students living in Ireland. The Department must set itself targets to increase access to affordable student accommodation and collaborate with the Department of Housing to address overcrowding.

The ELT Sector

The ELT sector has been estimated to be worth in excess of €762 million per annum to the Irish economy.¹ Yet despite its economic importance, regulating the sector has largely remained a low priority for successive governments. Frustratingly, the legislative framework to tighten regulations is already in place through the Qualifications and Quality Assurance (Education and Training) Amendment Act 2019 and the International Education Mark (IEM). However, there has been no public indication as to when the IEM will likely be implemented. It is also unclear which department will take the lead in its implementation.

Until the IEM is implemented, international students will continue to face difficulties in accessing their education rights. It is, therefore, ICOS' view that the Department's Statement of Strategy should outline the Department's role in the ELT sector and establish a timeframe for implementing the IEM.

Promoting Inclusion & Combatting Discrimination

Racism and discrimination are very much a reality of living in Ireland yet many higher education institutes do not currently have policies in place to address these kinds of incidents. ICOS welcomes the Department of Justice's report on legislating for hate speech and hate crime. However, it is important that a 'whole of government' approach is adopted in relation to tackling racism and discrimination. The Department's Statement of Strategy should outline the Department's goals to foster inclusion and ensure that higher education institutes are welcoming places for international students. ICOS would also like to see more action being taken to assist international students to integrate in their colleges, schools, and the wider community, which in turn will improve the overall student experience.

¹ Ireland's International Education Strategy 2016-2020

Conclusion and Recommendations

ICOS hopes that the DFHERIS will make a significant commitment to the higher education sector in its Statement of Strategy by setting out a new pathway for a more sustainable funding modal for higher education in Ireland. We also hope that the Department will commit to addressing the challenges that have been outlined in this submission, as well as seek to enhance the international student experience by strengthening students' rights.

Moreover, we would encourage that the Department's Statement of Strategy be outward looking and committed to promoting internationalisation throughout the higher education sector, which in turn will go towards shaping Ireland's new Internationalisation Strategy.

Finally, Ireland's recently published Diaspora Strategy 2020–2025 refers to embracing Ireland's 'reverse diaspora' - people who have lived, studied or worked in Ireland before returning to their home countries.² International students contribute so much to the diversity of Irish society, they are ambassadors for Ireland and play a pivotal role in Ireland's higher education sector. It is essential that we strive to ensure that all students are valued, treated equitably, and receive a quality education.

ICOS recommends the following:

- The Statement of Strategy should clearly define the remit of the DFHERIS and its relationship with other key departments - the Department of Education and QQI
- The Statement should outline a new funding pathway for higher education and commitment to implement the recommendations of the Cassells Report
- The Statement should set targets to increase access to affordable student accommodation and a commitment to engage with the Department of Housing to address overcrowded accommodation
- The Statement should define the Department's role in the ELT sector, its function with regards to the ILEP, and the relationship between the DFHERIS and the Department of Justice in addressing problems that occur in the sector that are related to higher education
- The Statement should go towards shaping Ireland's new Internationalisation Strategy
- The Statement should outline how the Department will address racism and discrimination
- The Statement should outline the Department's strategies to promote inclusion and foster integration of international students
- Further consultation should be carried out with stakeholders to define the mission and objectives of the DFHERIS
- Details on how the DFHERIS plans to incorporate the Sustainable Development Goals (SDGs) into its activities

² Global Ireland: Ireland's Diaspora Strategy 2020–2025

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