



**Submission to the Department of
Further and Higher Education,
Research, Innovation, and Science to
provide independent research, on
Ireland's new International Education
Strategy**

April 2022

About the Irish Council for International Students (ICOS)

The Irish Council for international Students (ICOS) is an independent advocacy organisation, and registered charity (RCN 20101275 / CHY 22357), whose mission is to protect the rights of international students, and to contribute to a vibrant international education sector in Ireland which has the quality of the student experience at its centre.

ICOS has 27 members, including all of the universities in the Republic of Ireland, many of the Institutes of Technology and all 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 the development of a new International Education Strategy (IES) for Ireland. While the State's [consultation paper](#) contains 25 questions relating to different aspects of internationalisation, this submission only addresses those which most align with ICOS' vision, mission, and values. In total, ICOS provided responses to 12 questions.

1. Are there initiatives introduced as a result of the pandemic which should be continued in a post COVID-19 world?

The pandemic has given rise to a new hybrid modal of teaching and learning which presents significant benefits, but also real challenges, to the Irish HEI sector. A key reason why international students chose Ireland as a study destination is for the 'student experience'. However, online learning limits the face-to-face and social interactions that international students seek. Research conducted by ICOS in 2021 found that just 32% of international student said that their online learning was meeting their expectations. Students reported issues, including, insufficient academic support, a lack of engagement, poor planning, as well as, problems with internet connectivity and devices. These concerns need to be recognised, and the right balance must also be found between having lectures online, and creating opportunities for students to interact. A focus on staff mobility and how to build intercultural classes could provide better support on a staff level for international students. It is ICOS' view that further investment and training is needed to ensure that blended approaches to teaching and learning are standardised and meet industry standards. Given that hybrid learning poses challenges for international students to access mental health and support services, for

example, if they are not present in the State, further investment and training will also likely be needed to ensure that these services are appropriately adapted.

1. Has Ireland used its scholarship programmes to the maximum advantage? Would you recommend changes to the current schemes to support a more strategic approach? What elements should be considered as part of a review of scholarships?

The Government of Ireland Scholarship is an excellent initiative for non-EEA citizens to pursue third level studies in Ireland. However, the scholarship has not been promoted sufficiently, and the selection process of awardees is unclear. Unlike other scholarships, the GOI Scholarship does not appear to align with other government strategic objectives. The additional administrative work which HEIs must undertake along with the timing for when scholarships are awarded makes it harder for institutions to plan student numbers.

In terms of the Ireland Fellows Programme, for which ICOS is the management agency contracted to deliver the fellowship, greater interdepartmental collaboration to promote the programme could prove beneficial. The State might also consider creating more short-term scholarship opportunities.

ICOS believes the 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 relation to funding and administration. The new strategy should commit to adopting a policy of non-deportation for individuals in receipt of scholarships, and their families.

2. What other measures and policies can be introduced or enhanced to support inward mobility and recruitment? (Alumni engagement, immigration, employment policies etc.)

Attracting and retaining high calibre researchers and international students rests on having immigration policies that are consistent with this objective. Yet with two separate bodies (ISD and GNIB) overseeing immigration functions in the State, Ireland's immigration service is disjointed and under resourced. The turnaround time for visa processing, the low approval rates for certain countries, the delays in the visa registration process, all make studying in Ireland a less attractive prospect for international students. This is further compounded by the poor communication between ISD and GNIB regarding important policy decision which causes confusion. There also appears to be little concern given to customer services as ICOS regularly receives complaints from international students over their experience with immigration.

Many international students choose Ireland because of employment opportunities, and while the State's external review of the last IES deemed that the Third Level Graduate Programme has been successful, findings from ICOS' International Student Report 2021 would suggest otherwise. A notable issue highlighted by participants was that the TLGP is not well known to

employers leading to difficulties securing graduate level employment. Considering the global competitiveness to attract international students, and the investment that students make to study in Ireland, this is concerning. It is worth noting that the UK, Australia and New Zealand all have more attractive graduate visas than Ireland. On this basis, the State should commit to revising the pathways to employment for all students and ensure that entitlements under each visa are promoted extensively.

The new IES strategy should consider new and innovative measures to improve inward mobility, for example, compiling pre-arrival information on all HEIs and English language schools or providing transport vouchers for students upon arrival. Inward mobility could be further enhanced by demonstrating higher levels of staff diversity in HEIs. More cohesion in practises and policies to develop the internationalisation of the curriculum at a national level could also lead to greater inward mobility in higher education.

3. Should Ireland link the granting of visas to enable a more balanced provision on certain programmes in accordance with national policy priorities?

It is ICOS' view that the role of immigration should be restricted to granting visas on the basis that an applicant meets the criteria, and that there should be no further involvement beyond this role as prioritising economic interests could damage Ireland's reputation as an international education destination.

4. How can Ireland's approach to International ERI contribute to achieving the mission and objectives of the DFHERIS Statement of Strategy? What should the vision for the new strategy be and what level of ambition should Ireland have, given the range of competing demands on resources, including rising demographic demands in higher education? What targets should be set for the new strategy?

Ireland's previous international education strategy primarily measured international students in terms of their economic impact with little consideration given to the rights, welfare, and overall international student experience. The vision for Ireland's new IES must centre around the quality of the student experience and not simply focus on international students as economic targets. For example, New Zealand's international education strategy sets targets for student satisfaction as one of their Key Performance Indicators (KPIs). New Zealand also commits to protecting international students from exploitation. The reality is that if international students have a positive experience in Ireland, word of mouth will spread, which will lead to more international students choosing Ireland over other study destinations. ICOS firmly believes that ambitions to attract more international students must be underpinned by a robust regulatory framework to protect international students, and be accompanied by the resources to cater for them. It is, therefore, vital that the new strategy's vision commits to enhancing the international student experience and has a strong focus on students' rights and welfare.

5. What risks need to be managed over the course of the next strategy, including potential for over-reliance on international fee income, potential shocks to future mobility, environmental challenges etc.?

The pandemic has highlighted the overreliance on international student fees in the HE sector. It is clear that this is not a sustainable funding model, and that a long-term response is urgently needed. Findings from ICOS' International Student Report in 2021 found disconcertingly high levels of racism and crime directed towards international students; 50% of international students said they had experienced or witnessed racism while in Ireland. Another key finding that surfaced in ICOS' research relates to overcrowded accommodation. Despite having the lowest rates of overcrowding in Europe, Ireland's lack of affordable accommodation forces many international students to live in overcrowded conditions. ICOS is also particularly concerned about the ELT sector, and the delays in the implementation of the International Education Mark (IEM). Every year, ICOS receive complaints from English language students who report, for example, being unhappy about their classes or being unfairly treated by their English language school. ICOS observes that there is no obvious official channel for students to escalate their grievances (other than through ICOS), and consumer legislation has proven to be ineffective in handling student disputes with education providers. When problems arise between an English language student and their school, there is often little the student can do should the school decide not to engage with them, which can put their immigration status in jeopardy. These are just some of the issues which must be mitigated against in order to protect Ireland's reputation as an international student destination.

6. What more can be done to enhance supports for International students at an institutional, sectoral and national level both to safeguard student welfare and to improve the student experience?

A national international student welfare strategy would provide a more holistic approach to enhance student welfare across higher education in Ireland. The strategy could also be used in tandem with the IES to establish metrics to measure the student experience. Similarly, a more strategic approach to integrating international students on campus, and in their local communities, could help improve students' experience and help deepen ties with Ireland. The involvement of international student in student unions (SUs) would offer international students the opportunity to focus on issues affecting them. At present, however, non-EEA students studying at HEIs cannot take up positions in SUs which limits their representation. Enhanced financial supports must also be considered for education providers to improve their mental health, wellbeing, and disability services.

The new IES must ensure that there are robust legislation and systems in place to protect international students' rights and ensure that they have a quality academic experience. The implementation of the IEM and Public Sector Duty, tighter monitoring of the English Language Training (ELT) sector, and hate crime and accommodation legislation, are among the key areas that would serve to safeguard international students in Ireland. Additionally, greater resources are needed to be directed to organisations providing supports to international students, and in particular those dedicated to English language students. For many years, ICOS

has operated a free information, support, and mediation service, but growing demands on these services have made it increasingly unsustainable to operate without funding.

7. What measures do you think could be introduced in the new strategy to mitigate against the high carbon footprint associated with international education travel and to make international education more environmentally sustainable in Ireland? How could R&I contribute?

A strategic hybrid approach to international education travel is required to mitigate against the associated high carbon footprint. For example, encouraging HEIs to develop more short-term programmes, such as virtual exchanges, and expanding blended learning models. One initiative which could incentive international students to reduce their carbon footprint is to provide pathways to accessing employment for courses that are delivered entirely online meaning students are not required to be physically in the State. Other ways of offsetting the carbon footprint of international education travel include incentivising sustainable travel, or forms of transport that are less impactful, promoting ways of reducing waste, and research exchanges on combating climate change. Education providers could also consider ways of reducing waste at an institutional level e.g ban on plastic.

8. Are there existing initiatives that can be expanded or are there new opportunities for Ireland's ERI systems to become more involved in its development education programme or contribute to resolving global challenges?

The strategy should aim to align development education and research goals with those of other stakeholders and departments, such as, Suas and DFA. One of the ways in which higher education on a whole could contribute to development is through the recognition of qualifications from low-income countries to create clearer pathways for people from the global south to be able to come to Ireland to study. Another possible initiative would be to prioritise collaborative projects on development issues with research partners in developing countries. Increased funding for development education, and supporting programmes for extracurricular activities that receive academic credits, could also play their part in understanding global issues.

9. What new structures or changes to existing policy implementation structures across all sectors could be considered as part of the new strategy?

There is a clear need for immigration reform in Ireland. For a country of this size, it makes little sense to have two separate bodies responsible for immigration registration. The immigration system and legislation lack consistency and transparency given that the decision to award a visa or not entirely rests in the hands of an immigration officer. In addition, the Interim List of Eligible Programmes (ILEP) should be revised to reflect the changes that have taken place in higher education during the pandemic to ensure online and blended learning

models are underpinned by quality until the International Education Mark (IEM) is fully operational.

In recent times, ICOS has seen an increase in the number of complaints from international students in relation to student recruitment agencies. Since 2019, there have been several high-profile agency closures which have left dozens of international students facing financial loss. ICOS proposes that student recruitment agencies should be included on an approved list of providers similar to the ILEP.

No meetings of the Higher-Level Group (HLG) have been convened in almost 18 months. The composition of this working group, the TOR, and the frequency of meetings are among the issues that need to be re-assessed to ensure the HLG is fit for purpose.

Health insurance is very expensive for international students and its requirement is a cause of much confusion. A possible way forward would be to remove non-EEA international students from the definition included under the Health Insurance Amendment Act 2019.

The new strategy should include an interim review.

10. What targets should be set for the new strategy? What are the key metrics and indicators that should be used to measure activity, including successful policy interventions in international ERI?

The new strategy should follow the example New Zealand's international education strategy which prioritises student satisfaction as one of its key metrics for success. For example, the strategy commits to measuring targets for international student perceptions on quality of education, and reputation of the country as an education destination. Ireland's strategy should also focus on these indicators, but also important areas that directly impact international students, such as accommodation targets. Without sufficient accommodation to house students, the strategy will not succeed. The implementation of the IEM is also critical to Ireland's success as an international education destination, and the new strategy should provide a clear pathway on when it will be implemented. In the interim period, ICOS would like to see targets publicised in relation to inspections of education provider to monitor for academic and regulatory compliance of the ILEP.

11. Are there other areas that require action that you would like to include in your submission?

The current time limit of 8 years for non-EEA international students creates a considerable disincentive for those who wish to progress through the higher education system in Ireland as some students are unable to avail of the Third Level Graduate Programme following completion of their studies despite making a significant investment in their education.

English language students on a Stamp 2 Visa should be provided with a 12-month visa.

Racism is a real and serious issue affecting international students in Ireland. The implementation of the National Action Plan Against Racism (NAPAR) should be complemented by all HEIs having policies in place to address racism.

For many PhD students, the stipend they receive is not enough to cover the cost of living in Ireland and the impossibility for their spouses to engage in employment makes it even more challenging to get by. Moreover, the barriers PhD students encounter during and after completion of their degree leads students to seek employment in other countries. This is especially concerning given that Ireland invests in many of these skilled students through stipends and scholarships, and raises questions about diversity and inclusion in the Irish higher education system.

For Further Information Contact:

Laura Harmon

Executive Director

lharmon@icosirl.ie

Brian Hearne

Communications Officer

bhearne@icosirl.ie