



# **Submission to the Department of Further and Higher Education, Research, Innovation and Science on the Public Consultation for a Tertiary Education Strategy**

**September 2025**

## About the Irish Council for International Students (ICOS)

The Irish Council for International Students (ICOS) is Ireland's national independent advocacy organisation for international students. Our mission is to protect and enhance the rights of international students in Ireland while championing their contribution to higher education institutions, local communities, and wider society.

ICOS has 27 institutional members, including all universities and technological universities in the Republic of Ireland, and many independent third-level colleges. Our membership also includes Aontas na Mac Léinn in Éirinn (AMLÉ)/the Union of Students in Ireland (USI). To ensure that student perspectives inform our work, ICOS convenes a Student Advisory Group composed of international learners from diverse backgrounds.

ICOS' values include consultation, collaboration, learning, and accountability. 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
- Showcase the important contribution of international education to Ireland's development and global engagement.

## Introduction

The Irish Council for International Students (ICOS) welcomes the opportunity to contribute to the Department of Further and Higher Education, Research, Innovation and Science's public consultation on a Tertiary Education Strategy. As the national body representing international students in Ireland, ICOS is uniquely positioned to highlight the perspectives and experiences of learners from around the world who choose Ireland as their destination for study.

International students enrich Irish campuses and communities through diversity, intercultural exchange, and economic and social contributions. According to government figures (2020), international students contributed €2.5 billion to the Irish economy in 2019/20, supporting over 17,000 jobs across the country (pre-COVID figures).<sup>1</sup> The presence of international students also strengthens Ireland's global reputation as a welcoming and outward-looking knowledge economy. Yet, international students also face significant barriers, particularly in areas such as accommodation, equitable access to supports, and representation in decision-making.

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<sup>1</sup> Department of Further and Higher Education, Research, Innovation and Science & Indecon Research Economists. (2020). [International Education Strategy Review 2016-2020](#). Dublin: DFHERIS, December 2020.

This submission sets out ICOS' vision for a tertiary system that embeds international learners as full members of the learning community, ensures their needs are addressed in mainstream policy, and strengthens Ireland's global reputation as a welcoming, world-class study destination. To achieve meaningful integration, the Strategy must embed the needs of international students across mainstream tertiary education policy rather than addressing them as a separate or peripheral concern. ICOS' submission reflects both the opportunities and challenges within Ireland's tertiary education system as experienced by international students, and offers recommendations aimed at ensuring that the Strategy supports a more inclusive, equitable, and globally engaged tertiary education sector.

## Strategy Objectives

**In your view, what should be the primary objectives of the Tertiary Education Strategy?**

### **Equity and Inclusion**

It is essential that international students are explicitly recognised within the Tertiary Education Strategy as a priority cohort, with equitable access to supports and services. Explicit recognition would ensure that their unique circumstances and challenges are not overlooked, and that policies are designed to foster inclusion, respect, and equal opportunity. This should include a clear commitment to learner voice, with international student representation embedded in decision-making at institutional and system level.

### **Recognition and Progression**

Establish fair and transparent recognition of prior learning (RPL), with particular attention to students from underrepresented regions, including the Global South, to enable fair access to further study and employment.

### **Wellbeing and Belonging**

Guarantee culturally responsive mental health and wellbeing supports, integrated into mainstream provision and resourced to meet diverse needs. Strengthen early-arrival induction and ongoing peer/mentoring supports to build belonging.

### **Accommodation**

Address the acute housing challenges facing international learners through commitments to affordable, safe, and student-focused accommodation. Set system-level housing targets (e.g., increasing student bed supply) and commit to tracking outcomes (e.g., days-to-secure-accommodation, affordability ratios average number of days international students take to secure accommodation; affordability ratios).

## **Integration**

Ensure international students have equal access to academic, social, and financial supports, enabling them to fully integrate into student life and thrive as part of Ireland's student community. Promote civic participation and work-integrated learning that supports employability and community connection.

## **Evidence, Impact, and Accountability**

Build an outcomes-focused tertiary system with shared KPIs, disaggregated data (including migratory status), and regular public reporting on retention, progression, wellbeing, accommodation, and graduate outcomes for international students; align indicators with Sustainable Development Goals (SDG) 4 and the National Access Plan.

## **Policy Coherence**

Ensure policy alignment between tertiary education and immigration (visas, work rights, post-study routes) so timelines and requirements are predictable and support student success.

## **Internationalisation**

Recognise international students as a core part of Ireland's internationalisation agenda. The Strategy should embed "internationalisation at home" by ensuring international learners are fully integrated into academic, social, and cultural life, while their presence enriches the global learning environment for all students. This strengthens Ireland's reputation as a welcoming, outward-looking system and supports all graduates to develop global competencies.

# **Strategy Actions**

## **What actions would your organisation like to see in the Tertiary Education Strategy?**

### **National Framework of Supports**

Develop a coordinated, system-wide framework so provision is consistent across institutions (accommodation; health and wellbeing, including mental health; academic supports; social/cultural integration). Set minimum standards: culturally responsive mental-health services; multilingual information; structured induction and peer mentoring; and housing guidance (anti-scam materials, deposit/guarantor alternatives, and referral protocols to purpose built student accommodation/community options). Require institutions to publish a short annual summary of how they meet these standards each year. Supports, services, and opportunities should take an accessible and inclusive approach, recognising the specific challenges international students face such as cultural adjustment, financial pressures, and language barriers.

### **Alignment with Immigration Policy**

Commit to closer alignment between education and immigration policy, including clarity on visas,

work rights, and post-study pathways. A clear, holistic approach will help maintain Ireland's attractiveness as a study destination and empower students to make informed decisions about their future. Establish a DFHERIS–Department of Justice liaison group to keep education and immigration policy coordinated. Work together to publish one clear pre-arrival guide (visas, work rights, health, housing) and standard documentation for internships/placements, with plain-English information on post-study options.

### **Oversight and Accountability**

Establish a Strategy Steering Group with diverse stakeholders, including ICOS and international student representatives, to oversee implementation. Publish regular “You said/We did” progress reports to provide transparency, evidence responsiveness, and ensure issues raised by learners and other stakeholders are systematically addressed.

### **Data and Evidence**

Commit to systematic collection and publication of disaggregated data on international student participation, progression, wellbeing, and graduate outcomes, to inform evidence-based policymaking. This would enable policymakers and institutions to identify trends, address emerging challenges, and measure the success of initiatives in supporting international students.

### **Sustainable Funding**

Ensure the Strategy is backed by long-term investment across the whole tertiary sector. While the recent €307 million allocation for higher education as part of Funding the Future is welcome,<sup>2</sup> the Expert Group on Future Funding of Higher Education (2016) recommended a €600 million annual investment in higher education by 2021 (a target not yet achieved).<sup>3</sup> Over-reliance on international student fees should not substitute for adequate public funding. A balanced approach is required, where international students are valued contributors but not positioned as substitutes for structural public funding in the tertiary education sector.

### **Employability and Skills**

Enhance pathways to employment during and after study through expanded internships, stronger industry partnerships, and clear, accessible post-study work routes. For many international students,

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<sup>2</sup> Government of Ireland, Department of Further and Higher Education, Research, Innovation and Science. (2022). [\*Funding the Future: A Policy on Funding Higher Education and Reducing the Cost of Education for Students & Families\*](#). 4 May 2022. Gov.ie.

<sup>3</sup> Expert Group on Future Funding of Higher Education. (2016). [\*Investing in National Ambition: A Strategy for Funding Higher Education\*](#). Dublin: Department of Education and Skills.

In parallel, Further Education and Training (FET) provision also faces resource constraints: SOLAS's [\*Future FET: Transforming Learning 2020–2024\*](#) strategy acknowledges the need for sustained additional investment to expand apprenticeships, adult literacy, and lifelong learning.

employability is a key factor in choosing Ireland as a study destination; enhancing employment opportunities also addresses Ireland's skills needs and support economic growth.

### **Sustainable Development Goals Alignment**

The Strategy should be explicitly linked to Ireland's *National Implementation Plan for the Sustainable Development Goals (SDGs)*, with a particular focus on SDG 4 (inclusive and equitable quality education). This includes ensuring equal access to tertiary education (Target 4.3), promoting equity and inclusion (Target 4.5), and supporting scholarships and mobility for students from lower-income countries (Target 4.b).<sup>4</sup> For international students, alignment with the SDGs means addressing barriers to participation, ensuring adequate housing and wellbeing supports (SDGs 3 and 11), and recognising their role in advancing diversity and reducing inequalities (SDG 10). Embedding the SDGs in the Strategy would provide a clear framework for accountability and demonstrate Ireland's commitment to "leave no one behind," with particular attention to equity of access and the inclusion of underrepresented groups, including international students at risk of being left behind in tertiary education.

## **An Adaptive and Responsive System**

**How can the tertiary education system become more adaptable and responsive to emerging challenges and changing contexts?**

### **Crisis Preparedness**

Build mechanisms for rapid response to global shocks, emerging challenges and changing contexts, such as pandemics, geopolitical crises, or cost-of-living pressures, which can disproportionately affect international learners.

### **Continuous Consultation**

Embed structured ongoing consultation with representative bodies, including ICOS, into the Strategy's governance to ensure that student voices and lived experiences inform the direction of the Strategy in real time. In conjunction with the Steering Group and feedback mechanism, this enables policymakers and practitioners to act quickly and appropriately and provide targeted supports when addressing any emerging challenges.

### **Flexible Provision**

Expand modular, blended, and part-time learning pathways, ensuring they are accessible to international students. As non-EEA students must enrol on full-time programmes listed on the Interim List of Eligible Programmes (ILEP), flexibility should be embedded within full-time delivery

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<sup>4</sup> United Nations. (n.d.). [Goal 4: Quality education: Targets and indicators](#). UN Sustainable Development Goals.

through options such as modular timetables, blended modes, and stackable micro-credentials. This supports students who are balancing study with permitted work.

## Strategy Success

### Which outcomes will define the success of the Tertiary Education Strategy?

The success of the Strategy should be defined not only by system-wide performance, but also by the experiences and outcomes of international students.

Key markers of success include:

- International students report high levels of satisfaction and wellbeing in national surveys, published annually and disaggregated.
- Ireland is consistently recognised as a leading destination both for academic quality and student experience.
- Equitable access to affordable, safe housing, healthcare, and supports is demonstrably improved for international learners.
- Clear, predictable study-to-work pathways exist for international students, with strong graduate outcomes.

## Outputs and Indicators

### What would be the most effective way to measure the success of the Tertiary Education Strategy?

The success of the Tertiary Education Strategy should be tracked through a small set of clear, measurable indicators, disaggregated for international students and aligned, where possible, with SDG 4. A short annual *International Student Outcomes Report* and public dashboard would provide transparency and accountability. Indicators should capture both quantitative outcomes and qualitative experiences:

- **Access and Participation:** enrolment, retention, and completion rates of international students.
- **Graduate Outcomes:** employment, progression to further study, and long-term contribution to Ireland's economy.
- **Housing, Wellbeing and Immigration Experience:** annual student survey data on accommodation, health and wellbeing supports, visa processes, work rights, and post-study pathways.
- **Learner Voice and Participation:** tracking international student involvement in governance, advisory structures, and decision-making in civic, cultural and academic life.
- **International Benchmarks:** comparative data on student experience and destination attractiveness, using recognised international surveys.

## Barriers and Enablers

**Can your organisation identify specific barriers or enablers to enhancing the system's focus on impact and outputs? How could these be addressed?**

We understand “impact and outputs” to mean clear improvements for international students (e.g., housing, wellbeing, study-to-work, inclusion) and simple, regular reporting of those improvements.

### **Barriers to impact and outputs:**

#### **Accommodation and Cost of Living**

High costs are a barrier for all students, but international students are often disproportionately affected. Evidence from ICOS and national datasets shows accommodation is the single largest cost driver for students, with many international students facing scams, overcrowding, and sub-standard housing.<sup>5</sup>

*Focus on impact by asking providers to publish a short annual housing summary (how students were supported; signposting; partnerships with PBSA; anti-scam steps).*

#### **Visa and Immigration Processes**

Complex and sometimes inconsistent visa/immigration processes, requirements and timelines.

*Focus on impact by alignment/liaison between DFHERIS and Department of Justice (DOJ) to share clear and accurate information.*

#### **Wellbeing, Integration and Academic Supports**

Gaps in access and consistency of supports.

*Focus on impact by setting minimum support standards (culturally responsive mental-health, induction/peer mentoring, clear study skills support) and asking providers to report briefly each year on delivery.*

#### **Discrimination and Racism**

Experiences of discrimination, racism and exclusion undermine belonging and outcomes. Sector evidence and ICOS research confirms discrimination and racism persist in Irish higher education; in the HEA's national race equality survey, 48% of staff respondents agreed that race inequality exists in Irish Higher Education, prompting a sector-wide implementation plan.<sup>6</sup>

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<sup>5</sup> Irish Council for International Students (ICOS). (2025). [\*Renting in Ireland: International Students' Experiences\*](#). Dublin: ICOS.

Higher Education Authority (HEA). (2023). [\*EUROSTUDENT VIII – Ireland: Key Findings\*](#). Dublin: HEA.

<sup>6</sup> Higher Education Authority (HEA). (2021). [\*Race Equality in the Higher Education Sector: National Survey of Staff—Analysis\*](#). Dublin: HEA.

Higher Education Authority (HEA). (2022). [\*Race Equality in the Higher Education Sector: Implementation Plan 2022–2024\*](#). Dublin: HEA.

Irish Council for International Students (ICOS). (2023). [\*Speak Out Against Racism\*](#). Dublin: ICOS.



*Focus on impact by continued implementation of race-equality actions (training, reporting routes, follow-up) and a short public note on what changed as a result.*

### **Communications and Feedback**

Students raise issues but do not always see outcomes.

*Focus on impact by simple, semester-by-semester “You said / We did” updates at provider level (and a short system-level summary), so changes are visible.*

### **Enablers (steps that support an impact/outputs focus):**

- **Annual International Students Outcomes Summary** (short, public, plain language), with a simple dashboard.
- **Student Housing Action:** A national housing strategy that explicitly accounts for international learners.
- **Coordinated Information and Communications:** Clear, consistent guidance across institutions tailored for international students, including contacts for housing advice, immigration advice and other international student supports at provider level.
- **Targeted Wellbeing and Integration Fund:** Dedicated resources for supports that enhance student wellbeing and integration.
- **Structured Partnership with ICOS:** Recognition of ICOS as a trusted intermediary and partner in delivering and monitoring the Strategy, represented on the Steering Group and relevant working groups.

## **Conclusion**

International students enrich Ireland’s tertiary education system, strengthen communities, and enhance Ireland’s international reputation. A Tertiary Education Strategy that explicitly embeds their rights, needs, and contributions across all objectives and actions will benefit not only international learners but the entire system. ICOS would welcome inclusion on any steering or working group established to oversee strategy development and implementation and stands ready to work with DFHERIS and other stakeholders to ensure international students are fully represented and supported in shaping the future of tertiary education in Ireland.