



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

SUBMISSIONS

WHITE PAPER

Policy on Authorisation to use
the International Education Mark

SUBMISSIONS

QQI received submissions by email from the stakeholders listed below.*

- » The Association of Study Abroad Providers in Ireland
- » Bridge Mills Galways Language Centre
- » Dorset College
- » Dublin City University
- » Eden School of English
- » Federation of Irish Complementary Therapy Associations
- » Higher Education Colleges Association
- » ICD Business School
- » Irish Council for International Students
- » IES Abroad
- » Institutes of Technology Ireland
- » Irish Universities Association
- » Marketing English in Ireland
- » SEDA College
- » The Learning Institute
- » University College Cork
- » University College Dublin

**Please note that the submissions appear as submitted and have not been proofed or edited.*

SUBMISSION BY:

**The Association of Study Abroad
Providers in Ireland**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SUBMISSION BY: Association of Study Abroad Providers in Ireland (ASAPI)

The Association of Study Abroad Providers in Ireland (ASAPI) is a representative body for American study abroad programmes operating in Ireland. We aim to bring a unified voice to the Irish study abroad sector, to serve as a platform for shared information, staff training and development for everyone who impacts the study abroad experience and to deliver improved standards throughout study abroad in Ireland in addressing the needs of the present and demands of the future.

Over 7,500 US students study abroad in Ireland each year, and the country is the 9th most popular destination for US students. These students may study within an Irish institution, or they may participate in programmes organised by their home university separate from the Irish education system, or in a hybrid-type program. Several US universities have physical facilities and staff in Ireland. Other US-based not-for-profit institutions have offices in Ireland and recruit US students and provide significant student services over and above that provided by the host Irish institutions. These programmes are all fully accredited in the United States, operate with standards matching or exceeding those laid out in the White Paper and Code of Practice, provide a significant financial benefit to Ireland, and are a significant cultural benefit to the people of both Ireland and the United States.

We fully understand and approve of the need for an International Education Mark and its Codes of Practice, but we are concerned that the US study abroad sector may not fit into the proposed model for the IEM.

You may recall that a group of study abroad providers (prior to the establishment of ASAPI) submitted very detailed comments to the previous round of consultation (Green Paper). That submission detailed our concerns that the US study abroad sector and its unique modes of operation need to be taken into account should the International Education Mark be linked to immigration permission. We did not receive a response to that submission, and subsequent documents relating to the IEM do not appear to have taken our concerns into account. The submission from September 2013 is included in this submission as an Appendix.

In brief, our primary concerns are as follows;

- 1) Early versions of IEM documents indicated that students attending institutions without the IEM from non-visa required countries outside the EEA will not be given permission to remain to study for courses of longer than three months duration. Text indicating links between the IEM and immigration has been removed from the White Paper, yet we remain very concerned that in fact a link will materialise.

- 2) The IEM as currently proposed does not appear suitable or appropriate for much of the US study abroad sector, especially those programmes not linked to Irish universities. We have significant concerns that many of the US programmes will not be eligible for the IEM, and then if the link to immigration does occur, our programmes of greater than 90 days would be forced to cease operations.
- 3) Many US programmes operate in partnership with Irish institutions. This may mean, for example, that the Irish institution is responsible for some or all of the academics, while the US institution or program provider is responsible for some or all of housing, pastoral care and student welfare, cultural immersion, and possibly one or more of the academic modules. In these situations where responsibilities are shared, would the US institution or program provider need to obtain its own IEM, or could it rely on the IEM from the host Irish institution?

We therefore seek clarification as to what steps the US study abroad community can take to ensure that our ability to obtain immigration permission for our students is maintained, especially if we are deemed ineligible or inappropriate for the IEM.

More specific comments concerning the White Paper are outlined below.

- 1) Much of the reasoning behind the IEM appears to be aimed at promoting (restoring?) Ireland as an international education destination. The US study abroad sector already does this for you for US students coming to Ireland. Our standards are strong, and our quality is high. There is no reputational or quality issue for US study abroad students coming to Ireland, so most of our members would only seek the IEM if it was required for immigration purposes.
- 2) On page 16 of the White Paper there is a comment about '*appropriate national diversity amongst student cohorts*'. Obviously English language, foundation programmes and US study abroad programmes are designed exclusively for international students, so this is not appropriate in all cases. We also find the statement that '*providers seeking authorisation to use the IEM 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*' to be incredibly restrictive and does not take into account the operations of US-accredited institutions operating in Ireland. Similarly, in the already distributed draft of the Code of Practice (Integration and Cultural Awareness section), there is a statement that '*international learners can be expected to be placed in accommodation that house a balance*

of international and home learners'. This is an unrealistic expectation given the student housing pressures currently being experienced, especially in Dublin.

- 3) While we have seen a draft of one of the five components of the Code of Practice through the Code of Practice Advisory Group, we feel complete comments on the White Paper and Code of Practice cannot be made until all five components have been distributed. Is the Code of Practice to be a checklist for which all criteria must be met, or is there to be a points system?
- 4) We are unable to comment in detail on the financial and tax compliance elements of the code of practice as these have not been made available. As many programs with a long history of quality educational provision in Ireland are run by international organisations, we believe it is essential that these requirements will accommodate providers with a base (home) country outside of Ireland. They should be able to demonstrate that their representative office in Ireland is appropriately tax compliant, and that they are tax compliant in their base (home) country.

Overall, we have great support for the idea of an International Education Mark for Ireland, but only if it is inclusive of all modes of international education currently operating in Ireland.

The Association of Study Abroad Providers in Ireland (ASAPI) is willing to work with QQI, the Department of Education and Skills, and the Department of Justice to ensure that all US study abroad providers operating in Ireland continue to meet high standards for education and student care. It does appear to us, however, that the current version of the International Education Mark does not adequately take into account this culturally vibrant and economically important sector.

SUBMISSION BY:

Bridge Mills Galways Language Centre

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and has not been proofed/edited by QQI.*

SUBMISSION BY: Bridge Mills Galway Language Centre

I read the white paper....points I note here on behalf of Bridge Mills Galway Language Centre. You can publish these as needed.

1. *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.*

How will English Language programmes we run now (for visa requiring students) leading to TIE/TOEIC/IELTS /CAMBRIDGE exams fit in here?...these programmes are ours on the International register presently.

2. *QQI will publish a draft Code of Practice to include principles and guidelines relating to supports and services available to international students.*

Do we know when this will be available in full?

3. *QQI will issue quality assurance guidelines and programme conditions for the accreditation of English language teaching organisations and associated programmes.*

Do we know when this will be available?

4. *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*

Do you have any guidelines on these 3 different fees? Are they related to the size of your school/ No of students etc.?

5. When will the process commence? 2014/2015?

6. When is the application deadline ? 2015?

7. Will there be an application form that we submit with supporting documentation?

8. Once we submit the application will there be an onsite inspection/ face to face interview or only paper based review of application?

SUBMISSION BY:

Dorset College

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Dorset College - Response To QQI White Paper – Policy On Authorisation To Use The International Education Mark

Page 7: Providers Seeking Authorisation to use the IEM

The inclusion of the "additional class of provider" needs to be defined so that the achievement of the IEM mark is not diminished. The majority of a provider's programmes should lead to a recognised QQI award.

Page 11: Education in Ireland – Enterprise Ireland

I strongly believe that Enterprise Ireland should be promoting the recognised English Language sector once the IEM is implemented.

Page 14: Fees and Charges associated with the IEM

Dorset College is accredited by QQI for ACELS, FETAC and HETAC programmes. There is a concern that we would have to pay unnecessarily for being in the three sectors while under the one QQI umbrella.

Page 16: Authorisation Process

I think that it is imperative that QQI ensures that the IEM will be granted simultaneously to all qualified providers. Not to do so would put many providers at a serious competitive disadvantage and indeed may damage or close their business.

A reference is made that providers demonstrate a minimum of five years' experience in the delivery of high quality education or training outcomes to domestic, including European students. This seems to be a fair approach for legitimate providers.

It should not require a full institutional review to assess "high quality" and a provider's ability to achieve the IEM. I am noting this point as it was proposed by one provider in the original meeting to assess high quality. I strongly disagree with this notion.

SUBMISSION BY:

Dublin City University

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and has not been proofed/edited by QQI.*

SUBMISSION BY: Dublin City University (DCU)

Consultation response prepared on behalf of Dublin City University, which may be published

Submitted to QQI by:

Dr Sarah Ingle, Director of Quality Promotion

sarah.ingle@dcu.ie 01-7005928

29 July 2014

A. Overall feedback

DCU notes that the policy set out in this White Paper will be supplemented by the following:

- A Code of Practice for the provision of programmes to international learners;
- General conditions in relation to authorisation to use the International Education Mark (IEM);
- 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;
- A schedule of fees and charges associated with the use and development of the IEM.

DCU thanks QQI for the opportunity to provide feedback on the IEM white paper and wishes to make some general comments that might be helpful to inform the development of the IEM policy and the above associated documents:

1. In regard to the DCU incorporation process, as outlined in the annual dialogue meeting DCU welcomes QQI's acceptance that our IEM engagement will be as one entity, comprising all four institutions, in the 'new DCU' (DCU, SPD, MDI and CICE).
2. The major revision of the draft Code of Practice (CoP) for the IEM is welcomed as there are many aspects of the current code that would be very difficult to implement as it currently stands. Further consultation on the CoP as proposed, with the sector, is very desirable.
3. In the final policy it is suggested that the term 'domestic' (learner or provider) in an IEM context be clearly explained, or omitted.
4. In a specific DCU context, it is not quite clear how foundation programmes in organisations such as DCU Language Services (which doesn't have established procedures for access, transfer and progression), or the 3U Pathway Programmes (which will not have five years of provision completed before the IEM is introduced) will access the IEM. Clarification on this would be welcome in the resulting policy.
5. The proposed fees and charges proposed for the IEM (Section 7), including timings, require further clarification. Why a variable element in regard to the number of international learners is to be included is not clear. More information on the fees and charges would be

welcome, in particular the fee in relation to review provider compliance with the code and how that would be imposed.

6. As outlined in 4.3.1, authorisation to use the IEM will be a condition for providers wishing to access national marketing and promotion supports. It is not clear whether there will be a transitional arrangement for those who have earlier access to the mark than others. If such an arrangement is not provided then high quality providers could be disadvantaged.
7. In relation to the previous point, regarding the authorisation process (Section 9) and the sequencing of applications, it is unclear which sectors will be identified as 'strategically important' in the government's plan for international education and how these will be determined. In DCU's opinion, a three year renewal of the IEM would also be more appropriate in order to align with current international student promotional practices.
8. Finally, it is hoped that some guidance and assistance will be provided to the sector regarding relevant IEM training needs for staff and the provision of information around cultural difference.

B. Specific feedback:

Several typographical errors and examples of reduced clarity of expression were noted throughout the document, which DCU hopes can be addressed during the development of the final IEM policy.

Some of these are noted below where comments and/or queries on certain sections are suggested:

Page 3, 1.2.3: ... change - programme of education and training '*offered by the provider and which leads to*'... It is also suggested here that the work 'recognised' is not strong enough in this context, perhaps 'recognised and mapped..'?

Page 5, Opening paragraph: Should another word be included before 'destination'? e.g. 'superior' or 'quality'? Some editing needed in first sentence? '... and that....'. DCU also suggests that the use of the word 'destination' implies that international students would in all cases have to travel to a Dublin campus, whereas off-shore/remote provision is currently and will continue to be, utilised. Also, as Irish students are not currently 'assured' of a high quality 'social and cultural experience', is this therefore appropriate for international students? This is also relevant at the end of 2.1. i.e.

Should 'student experience' be replaced by '*experience to be expected by the international student*'?

2.2: 'Ireland's'

Page 6, end of 2.2: with whom should the 'engagement' referred to take place? All relevant stakeholders?

Page 7, Point 3: What does 'validated' by QQI mean? Same as accredited?

Page 7, 2nd paragraph: The term 'voluntary providers' as used here is unclear despite the footnote provided. The rest of the paragraph may also need some editing for clarity.

Page 8, 3.1: It would be helpful if QQI could provide the specified conditions.

Page 9, 2nd paragraph: It is not clear how providers can be expected to deliver a high quality student experience after enrolment and for what period of time. Once the award is made, the student has become a graduate and alumnus.

Page 10, 4.1: The first sentence of this paragraph needs some editing. There may be one or two words missing?

SUBMISSION BY:

Eden School of English

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and has not been proofed/edited by QQI.*

SUBMISSION BY: Eden School of English

Having read the white paper on QQI Policy re the new International Education Mark, I have one point to suggest:

It is my understanding that there is no automatic transition from the existing ACELS scheme to the International Education Mark, and that schools need to apply to QQI to be considered for the IEM. Is it a possibility that during the transition, QQI would consider using both the ACELS and IEM brands for a period of approximately 12 months in order to facilitate the changeover? It would also ensure that international clients and students are aware that IEM carries the same level of quality and respect as the ACELS brand before leading to an overall phase out of the ACELS name.

SUBMISSION BY:

Federation of Irish Complementary Therapy Associations

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and has not been proofed/edited by QQI.*

SUBMISSION BY: FICTA-PDC



1. Contacts: e mail <ficta.post@gmail.com> ; Tel: 086 056 3263 / 01 295 6129
2. Responding on behalf of a professional organisation.
3. No objection to publication.

SUBMISSION QQI WHITE PAPER

Policy on Authorisation to use the International Education Mark (IEM).

Opening remarks

One of the aims of the Green Paper stage of public consultation was to stimulate stakeholder interest. In viewing the published list of participants who submitted feedback on Section 4.4, FICTA notes there was no submissions from student bodies. As the status of learners qualifications, both international and domestic, will be impacted by the use of the IEM, the QQI should consider how it can redress that significant gap before concluding consultation on this item.

1.1 - The Legislative Context

Establishing the IEM on a statutory basis could obstruct or complicate the evidence basis for future changes. In addition, excessive fees and administration costs to providers could compromise or defeat this government initiative to attract "talented international learners" to study in Ireland.

1.2 - *Preconditions for Providers seeking authorisation to use the IEM*

Including the requirements for authorisation to use the IEM in a providers QA procedures, ATP procedures and recognition and/or alignment with the NFQ would make for holistic policy for recognition within the Framework.

2. Policy Context and Background

FICTA agrees that a strategic framework for the development of policies for sustainable growth in the quality of education is required.

2.1 - The initial purpose of the IEM is to attract talented learners to study in Ireland. Economic considerations are particularly relevant to the success of this objective.

SUBMISSION BY:

Higher Education Colleges Association

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SUBMISSION BY: Higher Education Colleges Association (HECA)

Page 5: 2.1 – International Dimension

The Policy states that the “development of policy for the authorisation of the International Education Mark has been informed by national and international practice and standards”. HECA members feel it is essential that such Policy *continues to be informed* by national and international best practice and standards.

Page 7: 3 – Providers Seeking Authorisation to use the IEM

HECA would like clarification as to what is envisaged by the “additional class of provider” and believes that any such provider must have the majority of its students attending programmes leading to QQI awards.

Page 8: 3.1 – Conditions

It is stated that QQI may specify any other conditions it thinks appropriate. HECA would like an assurance that any such conditions would observe the letter and spirit of the Act.

Page 9: 4.1 – Compliance with the Code of Practice

The last paragraph states that “Effective Codes of Practice aresupported by effective monitoring of compliance and fair and consistent treatment of breaches”. What form will that monitoring take? Will it take place in the context of existing QQI review processes?

Page 10: 4.3 – International Education Mark – Branding

Mention is made of “associated visual emblems or logos”. HECA would like an assurance that associated visual emblems or logos must be standard for all users of the mark; not to do so would give rise to a differentiated rather than a unified mark.

Page 12: 5 – Implications for the Existing ACELS Scheme

The last paragraph states that QQI intends to maintain an identifiable brand for the new statutory scheme for the accreditation of English language teaching organisations. Does this mean that there is going to be a new brand for the English Language sector; is it intended that there will be a separate IEM for that sector? If that is the intention, HECA would strongly resist such a policy

because it would inevitably compromise the integrity of the brand which must be cohesive and unambiguous.

Page 14: 7: Fees and Charges associated with the IEM

The Policy states that there will be 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. HECA is of the view that a charge per learner would be most undesirable as it could prove to be a deterrent/ disincentive to providers to pursue stated Government strategy for International Education.

In relation to a fee to review provider compliance with the Code, HECA suggests that this should be based on additional work required in relation to providers with large numbers of students.

Page 16: Authorisation Process

HECA is concerned by the statement that sequencing of the application process will be determined by the education and training sectors identified as strategically important in Government strategy for International Education. With the exception of English Language providers, all of whose learners are by definition international, QQI must give a commitment that the IEM will be granted simultaneously to all qualified providers. Not to do so would put many providers at a serious competitive disadvantage.

Reference is made to providers being required to demonstrate a minimum of five years' experience in the delivery of high quality education or training outcomes to domestic, including European, students. How will "high quality" be assessed? There need to be a clear definition as to what constitutes "high quality". Does it mean a satisfactory QQI Institutional Review?

Page 20: Appendix 1 – Code of Practice – Indicative Content:

The IHEQN Code of Practice refers to the Enrolment Process and mentions "letter of rejection", "reason for rejection" and an appeals procedure in relation to "rejection". There does not appear to be any reference to the Enrolment Process in the White Paper. The section Finance: Fees, Refunds, Subsistence does not refer to an appeals process in relation to fee refunds.

Finally, under the heading Academic Support, there is no reference to a Grievance and Appeals Procedure in relation to academic matters.

SUBMISSION BY:

ICD Business School

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SUBMISSION BY: ICD Business School

I am writing to you in relation to Section 61 (8) of the 2012 Act and would like to suggest the following in relation to providers of Higher Education seeking the International Education Mark (IEM)

1. Any provider of Higher Education applying to QQI for the IEM should have as a minimum three (3) courses validated by QQI and on the NFQ at level 8 and or higher.
2. That the provider has delivered these courses within the past three years or before
3. That the provider has graduates from these programmes in the past three years

The main concern that we in ICD Business School would have regarding the IEM and some providers, is that QQI would spend time and money on promoting and guaranteeing the quality relating to the IEM and particular providers who only have one programme (that may or may not be being delivered) would be allowed to pass themselves off as a Quality institution when in reality only a small percentage of their courses and students would be QQI related.

SUBMISSION BY:

Irish Council for International Students

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SUBMISSION BY: Irish Council for International Students (ICOS)

ICOS welcomes the opportunity to comment on the White Paper. This response complements ICOS' earlier responses to QQI on the IEM Green Paper and more recently on the Draft Code of Practice.

Protection of Learners and Definition of International Learner

The policy defines an international learner (in keeping 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*".

Protection of Learner (PEL) arrangements are understood to apply only to courses of more than 3 months duration.

Given these limitations ICOS is concerned about the protection available to students who:

- Have enrolled on courses and paid fees but not yet travelled to Ireland
- Students who enrol on courses of under 90 days duration
- Students in colleges which close due to suspension for visa purposes

Students in all of the above situations suffered losses and disruption to their studies during the recent college closure crisis and it is to be expected that more closures will follow as regulation is tightened. Therefore:

- Adequate risk management and transition planning must be built into the authorisation process for the IEM in order to avoid further losses to students and further damage to Ireland's image as an educational destination.
- Institutions seeking authorisation to use the IEM should have fee protection/ PEL arrangements in place which will protect the tuition fees of all students once any money is handed over whether or not a student has yet travelled to the State.
- Any Irish institutions involved in transnational education whether through flexible learning or international branch campuses should also be required to show how the fees of their enrolled students are protected.

Pre-Conditions for Providers

It is not clear from the White Paper how Study Abroad providers who do not have formal links with recognised Irish educational providers will be able to seek authorisation to use the IEM.

- Study Abroad providers should be capable of pre qualification to use the IEM on the basis of validation through their home university provided this validation is capable of being verified through UK Naric or alternative system (ref UK system).

It is understood that the IEM will be a pre-condition for providers who enrol visa required students.

- The link between the IEM and visas is not explicit in the document and should be clear.

The White Paper, Section 9, p16 notes that applicants for the IEM should have “appropriate national diversity among student cohorts” and that providers seeking authorisation to use the IEM 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”. While, English language and foundation programmes are specifically mentioned as not been able to achieve these conditions because of their exclusive nature, other programmes which might be considered niche or exclusive to international students are not mentioned. Stand alone study abroad programmes for example would be excluded from the IEM if these criteria were applied. The 5-year rule might also need to be reconsidered to take account of the different contexts in which providers may be operating.

Code of Practice and Compliance with the Code of Practice

ICOS has previously commented on the draft Code of Practice which was released in April and will continue to engage with QQI and other stakeholders during the consultation phase.

ICOS welcomes the reference in the White Paper (p9-10) to the role of international students in terms of measuring the effective implementation of the Code by providers.

- Mechanisms for capturing student feedback and analysis of results should be a Code requirement.

Withdrawal of Authorisation to use the IEM

QQI will need to have a robust inspection scheme in place to ensure confidence in the integrity of the IEM.

One of the lessons from the recent college closure crisis is that early warnings were not acted upon. Complaints from students especially where patterns of complaint were emerging would highlight compliance issues and should trigger inspections.

- ICOS has previously suggested that students in private sector colleges should have an Ombudsman service.

Public Information on Providers authorised to use the IEM

The consumer information and public information aspects of the IEM should be comprehensively articulated and adequately resourced. Consumers will not be sufficiently served by the maintenance of a directory of providers alone ref Section 8, p 15 in the White Paper. The most important consumers in this respect are potential international students and they need to understand what the IEM means in the context of Ireland's overall qualifications and quality framework.

SUBMISSION BY:

IES Abroad

*Please note this response appears as received
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SUBMISSION BY: IES Abroad

I have attached here our IES Abroad “Statement for Inclusion in the International Education Mark Designation”, and would like to make a few preliminary points regarding the white paper.

Although we are founding members of ASAPI - the Association of Study Abroad Programmes Ireland, and are included under their overall representation, I thought it would also be useful to respond on our own behalf.

I have concerns that the Paper does not specifically address the study abroad sector, and in particular the US “third-party” study abroad sector, which is well-established and of considerable size, both in Dublin and throughout Ireland. The majority of these programmes are of very high quality – more than fulfilling the criteria outlined in the white paper, and have been here for many years. We were established here in 1999, but were set up as an educational not-for-profit for worldwide programmes in 1950.

As U.S. third-party providers, we are not linked to any single university in the states, but rather represent a long-established consortium of Universities. In Ireland, we send students, through us, to Trinity and DCU, and the Gaiety School of Acting, but also lecture our own in-house courses. These are accredited by the consortium members, are rigorously assessed by them, and evaluated by the students themselves, yet it is unclear whether they fall under the criteria for IEM inclusion.

Furthermore, although we fulfil all the criteria of quality, pastoral care, and tax compliance laid out here, there is a clause in the White paper that would seem to exclude programmes such as ourselves from inclusion in the I.E.M. On page 16, under “Authorisation Process” it asserts: “Providers seeking authorisation to use the IEM will be required to demonstrate a minimum of five years experience in the delivery of high quality education or training to domestic, including European students” This would seem to exclude, not just ourselves, but a swathe of excellent US programmes from application for the I.E.M.

IES Abroad Statement for Inclusion in the International Education Mark Designation

Institute for the International Education of Students (“IES Abroad”) is a third-party study abroad provider which began in Vienna, Austria in 1950. Over the last 64 years, IES Abroad has developed and strengthened its mission to provide premier study abroad programmes for American students that deliver the highest quality education while simultaneously promoting the development of intercultural competence among its students. As a provider of study abroad programmes for American students in Ireland, IES Abroad submits this statement in support of adding a categorical designation for study abroad programmes and third party study abroad providers such as IES Abroad to the International Education Mark (“IEM”) designation.

IES Abroad operates 35 centres in 21 countries, including a centre in Dublin, Ireland. IES Abroad has an operating budget of more than \$85 Million U.S. Dollars and hosts approximately 5,500 students each year at its centres abroad drawing from its consortium of over 200 U.S. colleges and universities, including Ivy League colleges, such as Yale and Harvard. Since opening in Dublin in 1999, IES Abroad has offered standard and customized study abroad programmes to its students. Over the last 15 years, IES Abroad has hosted nearly 2,500 American students in Dublin, including 1,996 standard programme students and 490 customized programme students.

Through its Dublin programmes, IES Abroad supports the Irish economy in multiple ways and in the last five years, has added approximately 1.6 million euros to the local economy each year. IES Abroad's contributions include salaries paid to local staff and instructors, rent for office and classroom space and student housing, tuition fees paid to partner universities in Dublin and income to hotels, restaurants, local businesses, and tour companies across Ireland which support IES Abroad's students' field trips, as well as students' independent travel in Ireland. Many of IES' students and families return to Ireland as tourists, adding to the Irish economy. Further, IES Abroad's efforts contribute to jobs to the Irish economy for Irish citizens in the educational field and beyond.

Standard Programmes

IES Abroad partners with three local Dublin higher education institutions, including Trinity College, Dublin City University and the Gaiety School of Acting, where it enrolls American students directly into their programmes for summer, semester and full year terms.

IES Abroad also hires local Irish instructors to teach courses at its Rathmines Centre, which include Irish studies (Irish history, literature, and politics including courses on the Northern Irish "Troubles"), a supplementary course to the Gaiety School of Acting, and two new programmes, due to start in 2015. IES Abroad's programmes offer students an opportunity for an interdisciplinary focus on Irish politics, culture and society, which distinguishes this programme from the direct enrolment option. Further, IES' programmes bring students into direct contact with Irish culture and society by introducing them to significant writers, thinkers and political leaders. IES' goal is to share its enthusiasm for Ireland with its students and through its study abroad programmes, IES develops life-long friends of Ireland. Like its direct enrolment programmes, students can study at the IES Abroad centre for a summer, semester or full academic year.

IES Abroad's planned new programme offerings include a Writing concentration and an

Entrepreneurship and Technology Programme where students will attend courses taught by local faculty at the Rathmines Centre. These two programmes are anticipated to bring 50 new students to Dublin for the 2015-2016 academic year.

In addition to educational services, IES local staff provides orientation, health, safety and welfare support and organizes field trips for both its students directly enrolled at IES Abroad's partner universities and its Rathmines Centre students to increase their exposure to Dublin and Ireland and enhance their cultural engagement and learning. IES Abroad also leases its own student housing for IES students.

Customized Programmes

The IES Abroad centre in Rathmines also hosts groups led by instructors from U.S. colleges and universities. These instructors bring American students on short-term programmes, which make use of the IES Centre facilities, apartment housing and field trips organized by IES Abroad. In the Dublin Centre's 15-year history, it has hosted 36 customized programmes including 490 students and intends to continue these offerings.

Quality Certified Programmes

IES Abroad supports Ireland's goal of developing and maintaining a high quality educational experience for all students who study abroad in Ireland. The quality of IES Abroad's programmes is evident through its student and programme evaluations and supported by IES' affiliation with the internationally recognized Forum on Education Abroad ("Forum"), the standards setting organization for study abroad designated by the United States Department of Justice. As one of the founding members of the Forum in 2001, IES Abroad has contributed to the development of the Forum's well recognized Standards of Good Practice. These standards were developed to improve the quality of education abroad programmes, such as those that IES Abroad provides in Dublin. To support IES Abroad's belief in these standards, Dr. Mary M. Dwyer, President and CEO of IES Abroad, served as a Founding Board Member and as Chair of the Board of Directors of the Forum on Education Abroad until last year. Dr. Michael Steinberg, Executive Vice President of Academic Programs for IES Abroad, chaired the committee that created these standards and co-authored the preamble to the standards, and IES Abroad Executive Vice President and COO, William Hoyer, has been a Director of the Forum for the past 9 years. Today, Forum members' students represent over 90% of the U.S.

students who study abroad and its standards are well-established in the field. The Forum is also extending its global reach through its European Conference, the first held at University College Dublin's campus in 2012, and a number of Irish higher education institutions are Members of the Forum.

The Forum provides its now 650 institutional members with the opportunity to participate in and be certified in its Quality Improvement Program ("QUIP") for education abroad. Of its 650 members, IES Abroad is 1 of 14 select members that has earned the QUIP certification. It was the first major U.S. study abroad provider to be QUIP certified. The QUIP certification is the only review process for the education abroad field that is based on an objective set of standards and involves an independent review conducted by the Forum Review Panel, composed of seven senior education abroad colleagues. In order to earn QUIP certification, the Forum conducted a rigorous analysis of IES Abroad, including site visits to its headquarters and representative programme sites abroad. IES Abroad's QUIP recognition, earned in 2010, is valid for 8 years. IES intends to seek recertification upon expiration of this period. As a leader in the international education field, IES Abroad is committed to providing high quality academic programmes and relies on the strength of its evaluations, independent programme reviews and an independent academic governance system comprised of elected representatives from its 210+ U.S. college and university consortium members to make continuous programme improvements and through this certification, has and will continue to improve the quality of its programmes. Please see Exhibit A for student testimonials regarding their experience attending one of IES Abroad's Dublin programmes.

IES Abroad is dedicated to both providing a premiere educational experience to its American students in Ireland, and to supporting the Irish government's stated goal to provide quality programmes. Indeed, IES already fulfils all the fundamental criteria outlined in the *Code of Practice for Provision of Education and Training to International Learners*, as laid out by the QQI, and elaborated on in the *Evaluation of Compliance* matrix.

Ireland's inclusion of IES Abroad in the field of study abroad providers on the list of educators eligible for the IEM will help support and enhance the quality education which Ireland already achieves for its students, both domestic and international, and has committed to provide in the future.

SUBMISSION BY:

Institutes of Technology Ireland

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SUBMISSION BY: IOTI

IOTI notes the publication of the QQI White paper 'Policy on Authorisation to use the International Education Mark'. The paper sets out clearly and succinctly the legislative and policy context for the IEM; and also the pre-conditions that will apply to providers seeking to use the IEM, and the process (in broad terms) that providers will follow in making an application to QQI to use it.

IOTI supports the policy approach that links authorisation of the use of the IEM to a provider having quality assurance arrangements in place that are compliant with section 28 of the Qualifications and Quality Assurance 2012 Act; that a provider's programmes should lead to awards recognised in the NFEQ, where such recognition is possible; and that the provider should also have ATP procedures in place that are compliant with section 56 of the 2012 Act. Indeed, IOTI considers that these are the essential requirements, rather than merely pre-conditions, for authorisation to use the IEM. IOTI believes that there should be a stronger recognition and endorsement in this policy of the existence of the statutory quality assurance regime that has been in place in public higher education, and other parts of the education and training system, since the 1990s, and which is now set out in Part 3 of the 2012 Act. Surely, it is the core quality arrangements of the system – a system which QQI and its legacy bodies have helped to develop and over which QQI has a key presiding and coordinating role – that will be at the heart of the delivery of a quality educational experience to international and, indeed all, students attending Irish education and training institutions.

As mentioned throughout the document, the White Paper will be supplemented by additional policies/documents, the most critical of which is the Code of Practice for the provision of programmes to international learners. The authorisation of use of the IEM is wholly dependent on compliance with the code, and thus it is difficult to provide feedback on this document in the absence of a finalised Code of Practice. IOTI notes that a consultative working group is working with QQI on the development of the Code of Practice. IOTI is participating on this group and has already given feedback on a preliminary draft of the Code. IOTI considers that most of the issues raised in that feedback are relevant to this White Paper and would ask that the latter submission would also be taken into consideration.

For IOTI, there is one overriding issue that needs to be addressed. The introduction of the Code of Practice/IEM as a separate quality apparatus presents a very real danger that two, parallel quality systems will be operated by QQI in the future: the first will be the mainstream QA regime as set out in Part 3 of the 2012 Act; the second will be the QA regime set out in Part 5 of the Act. Very little information has yet emerged as to how these QA regimes will be integrated. The way the White Paper is framed suggests that providers will be subject to one system (Part 3 of the Act) as a pre-condition for applying for a second system of QA (the Code of Practice under Part 5 of the Act).

Moreover, all indications so far would suggest that the Code of Practice will be more detailed and more prescriptive than the former system; and that it may come perilously close to undermining the provider 'self-responsibility' for QA that is embedded in *the Standards and Guidelines for Quality Assurance in the EHEA* (ESG). IOTI is concerned that in promulgating and using the IEM/Code of Practice both as a device for regulating disreputable private providers, or for bringing in English Language Training Organisations under the mainstream QA system, potentially serious damage will be inflicted on the existing quality regime in public Higher Education, which has been carefully constructed over a considerable period of time and designed to foster provider self-responsibility for quality matters. At present, in the absence of the QQI guidelines on quality assurance that are due to issue under section 27 of the Act, and the finalised Code of Practice, it is difficult to tell how the different parts of the overall quality regime will fit together. IOTI believes that there is now a need for QQI to develop an overarching policy statement on how all the different elements of the QA system will fit together. It would be useful, for example, to know how QQI thinking on the Code of Practice fits in with QQI thinking on the ESG and the section 27 QA guidelines, or with the monitoring of QA and annual engagement/annual dialogue with providers. In the absence of such an overarching statement, it is difficult for providers to evaluate the real implications of particular draft policies. Such fragmentation may lead to incoherence.

There are two other issues of concern that IOTI has at present in relation to the White Paper. These relate to the application fee and the annual charge for the IEM. IOTI has already raised concerns with QQI concerning the process used for deciding the relationship fees charged to the IoTs in 2014, both in terms of the transparency and equity of the process. IOTI considers that in deciding on the application fee and annual charge for the IEM, a transparent process should be put in place. IOTI considers that there should be consultation process with all potential users of the IEM, and other relevant stakeholders (including the HEA), in relation to the setting of the fee and charge. IOTI would expect to see a proper rationale for the setting of the fees and charge, and clarity as to whether QQI intends to set fees and charges on a cost recovery or revenue generation basis. IOTI also believes that the exercise should have due regard to the current financial state of institutions and the growing number of charges that are currently being topsliced from public HE provider budgets.

The final concern relates to the review of a provider's compliance with the code and the use of the IEM. The discretionary nature of QQI's authority in this regard – albeit it has a statutory basis – sits uneasily with the approach to QA that has developed over the past decade or so, where QQI and the

legacy agencies have been moving towards concentrating their reviewing activity in the institutional review, which is grounded in self-assessment, and external peer review. Again, the statement that QQI may review compliance to the Code 'at any time' suggests that it may be used as an alternative instrument to the type of institutional review that one might expect to emerge from QQI's recent review of reviews exercise. In this regard, QQI might consider clarifying further the statement in section 10 of the White Paper that in carrying out a code of practice review 'QQI will have regard to any other review of the providers carried out under the 2012 Act'. Does this mean that QQI will always carry out Code of Practice reviews as distinct exercises, having regard to other reviews, or does the possibility exist that QQI might incorporate Code of Practice reviews in mainstream institutional reviews? Here, again, the question arises as to whether the Code of Practice/IEM may emerge as an alternative, more prescriptive apparatus, to the conventional system of QA, where QA processes are agreed between QQI and the provider, and there is an ongoing process of engagement re quality enhancement.

SUBMISSION BY:

Irish Universities Association

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SUBMISSION BY: IUA

IUA response to the QQI White Paper International Education Mark

The Irish Universities have and will continue to comply with national and international quality assurance procedures. As well-established and regulated education providers and designated awarding bodies (DABs), the Universities are concerned that the White Paper considers DABs in the same light as a largely unregulated sector currently providing education services exclusively to international students. The quality of university programmes is assured through regular internal and external quality assurance procedures, involving international experts and through on-going curriculum revision and internationally competitive research. University awards are on the National Framework of Qualifications and are fully in line with the various strands of the Bologna Process and other international higher education modernisation efforts. University programmes – both undergraduate and postgraduate, are in high demand with domestic, European and international students, at all levels. University graduates are readily employed in Ireland and internationally in a wide range of professional fields, and feedback from students, graduates and employers consistently compares well with existing international benchmarks.

Given these characteristics, the IUA wishes to ensure that QQI makes clear distinctions in the IEM application, authorisation, renewal and review procedures between the DABs and certain other classes of education organisations. We note that the introduction of the IEM is “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”. In our opinion, it is therefore important to distinguish between those providers which already enjoy such confidence and those providers which without the IEM may not enjoy such confidence. The White Paper should therefore make separate provision for these vastly different classes of education providers, and the procedures around the quality mark and the associated code of practice should also make such distinctions. Section 5 of the White Paper “Implications for the Existing ACELS Scheme” makes reference to the QQI intending “...to maintain an identifiable brand for the new statutory scheme for the accreditation of English Language teaching organisations” : there is therefore also an opportunity to make a clear distinction between the IEM procedures for education providers such as DABs and IEM procedures for English Language teaching organisations and other classes of providers which can be considered “higher risk”.

The White Paper states that “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.” While the universities support the concept of higher-risk providers being prioritised by QQI, the universities have concerns regarding issues of timing and sequencing, and possible consequences if some sectors are approved for IEM before others. The universities suggest that an interim solution for QQI to this current challenge would be to designate certain proven providers with the IEM brand until their next institutional review, allowing QQI to concentrate on the high-risk providers which have not previously been subjected to the same levels of external quality assurance procedures or accountabilities as those in receipt of public funding.

Section 7 – ‘Fees and Charges Associated with the International Education Mark’. This does not take into consideration that the DABs already comply with national and international quality assurance procedures. The proposed application of an annual charge suggests an annual review of compliance, which is neither desirable nor feasible. The QQI Act 2012 states that costs will not exceed €50,000 (\$62.5). The universities have already stated clearly that their preference is for the IEM review process to be integrated into their regular multi-annual institutional review process, thus ensuring coherence and efficiency for both QQI and each university. The universities note that no discussions or consultations have yet taken place regarding IEM fees and charges. The universities are working on the principle that, until fully established with a recognisable and trustworthy brand, the IEM brings little additional intrinsic value to their activities; this reality needs to be fully reflected in the structure of IEM fees and charges.

SUBMISSION BY:

Marketing English in Ireland

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SUBMISSION BY: Marketing English in Ireland

The following is MEI's submission on the White Paper for the IEM:

Page 12: existing implications for ACELS providers (nothing new);

Page 16: last paragraph needs clarification: 'providers seeking to use the IEM need to demonstrate 5 years' experience in delivering high quality programmes'.

Page 17: review of organisation at least once every 3 years. Will such a review be similar to the existing procedure for ACELS providers or will it have added layers? Will it include the QA section and the inspection section ?

Appendix 1: indicative code of practice. This will not work for ELTOs as it is clearly focusing on third level institutions. There needs to be a specific part/section for ELTOs. The White Paper clearly states that an organisation has to demonstrate compliance with the Code of Practice. Therefore, this document (CoP) will need to be relevant to our industry in order for our members to comply.

SUBMISSION BY:

SEDA College

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SUBMISSION BY: SEDA College

Dear QQI,

Having read the white paper on Authorisation to use the International Education Mark, I would like to make the following comments on behalf of SEDA College:

On a broad note, we welcome the International Education Mark, and see it as an excellent new initiative for improving quality systems within varying educational bodies in Ireland. More specifically, we are particularly encouraged by section 4.1 which underlines that all procedures regarding the gaining of authorisation to use the IEM be clear, relevant and provide specific examples and guidance.

Best wishes,

SEDA College

SUBMISSION BY:

The Learning Institute

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Submission on QQI White Paper *Policy on Authorisation to use the International Education Mark* from The Learning Institute

This document outlines our thoughts and questions which have been raised from reading the white paper, set out below in four sections. Within each section, certain questions/ issues are expanded on. While the style mainly used throughout is in question format, The Learning Institute does not expect individual or personal answers to be supplied by QQI, but rather that they be used as a springboard for further sector-wide discussion. We would also very much welcome the opportunity to participate in any further sector briefings/discussions as organised by QQI.

1. Statutory accreditation scheme for ELTOs

In section 9, Authorisation Process, it is stated that QQI will establish a statutory accreditation scheme for ELTOs.

- Will this scheme be run as a completely different entity and process to the IEM scheme?
 - If so, how will the criteria differ? Presumably, all of the indicative content for the proposed Code of Practice for the IEM would also have to be included in any other kind of accreditation scheme.
 - If an ELTO fulfils the criteria of one scheme, will they not, naturally fulfil the criteria of the other?
 - How much of an overlap will there be between the two? There is the risk of duplication here in terms of the accreditation process and production of associated documentation – it is important that this not place undue burden on providers.
- What format/process will the new statutory scheme take? How will it differ from the ACELS accreditation process?

SUBMISSION BY:

University College Cork

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and has not been proofed/edited by QQI.*

SUBMISSION BY: University College Cork (UCC)

UCC welcomes the opportunity to respond to the above White Paper. It has divided its comments into general, overarching remarks and more specific comment on individual parts of the paper.

Overarching comments

UCC understands that QQI is required by legislation to introduce an International Education Mark and welcomes work on the promotion of Ireland as a destination of choice for international study. However, it has some general concerns about the current proposal for the IEM:

- Given that the IEM will be awarded to all institutions that apply for it, it will only be as strong as its weakest link. Will there be any kind of ‘banding’ or grading of the mark?
- UCC understands that the intention is to stagger the introduction of the IEM with the English Language Colleges being the first institutions to be invited to apply. The University is aware of the reasons behind this decision but, nevertheless, given the size of the sector, feels that other HEIs may be unfairly disadvantaged on one part of the sector is prioritised and others (e.g. the DABs) are perceived externally as not having achieved the IEM.

Specific comments

1.1 Legislative context: whilst accepting that this is legislatively required of QQI, it is very difficult to comment sensibly on a proposal when the key document (the Code of Practice) has not yet been finalised;

3. Providers seeking authorisation: it is difficult to comment on this section without further detail on the mechanisms for application; for example, how far will this be part of any ‘normal’ institutional review cycle? The current wording would suggest that this will be a separate application/activity.

3.1 Conditions: It would be useful to have some further detail on the statement that “QQI may specify any other conditions it thinks appropriate...including specific conditions for an individual provider or class of providers” in order to comment fully.

4.1 Compliance with the CoP: UCC welcomes the idea of a Code of Practice that will be “clear, relevant, provide specific guidance and examples...”, and that is “...developed collaboratively with those required to implement them...” Such a tool should assist the DABs greatly in managing the area of international education. However, since the CoP has not yet been published for consultation, UCC reserves judgement on the matter.

7 Fees and charges: whilst understanding the cost of maintaining and implementing the IEM, UCC queries the need for an application fee, a review fee AND an annual charge. We would be interested in more detail on what benefit the university will receive for, for example, the annual charge. On a related matter, will there be some kind of financial scheme to cover those institutions that fail to achieve the IEM and, as a result, go bankrupt due to the majority of their business being reliant on the recruitment of international students?

SUBMISSION BY:

University College Dublin

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SUBMISSION BY: University College Dublin (UCD)

This is an Institutional response for University College Dublin:

UCD welcomes the underlying principles of the IEM to protect the education brand of Ireland and to promote confidence in the quality of the educational experience delivered by education and training providers to international students in Ireland.

UCD has no significant issue with the key stages of the policy relating to the authorization to the use of the IEM as set out in the White Paper, however, it notes that the more detailed operational Code of Practice to accompany the Policy will be a critical document in the overall operation of the IEM process.

UCD notes the indicative content of the forthcoming Code of Practice as set out in Appendix 1 - given the scope of the intended criteria, care will need to be taken not to develop a Code of Practice that is excessively prescriptive and administratively burdensome to institutions.

The application and evaluative process should be straightforward and simple

Given the diversity of the range of institutions/organisations that may apply for the IEM, UCD is concerned that the White Paper appears to present the application and evaluative process for the IEM as a 'one-size-fits-all' - UCD does not think this is appropriate, and would, for example, prefer to see some degree of differentiation to reflect organization type/size/provision/resourcing - perhaps a two or three tier IEM structure

Will the annual charge for the IEM be included in the relationship fee paid by the universities? More details of what the level of fees will be would be welcome.

More detail would be welcome around the nature of the promotion of the IEM, for example will it be concerned about the Mark itself and/or the quality of the education/training an international learner that a student might expect in Ireland?

UCD notes that it is proposed to sequence the application process for the IEM, with providers of English language teaching being prioritized. UCD understands the need to phase this process, however, has there been any time projection as to when other institution types will be assessed for the IEM given the potentially high number of providers in this category (language providers) who may apply.

The White Paper does not make clear who will evaluate each applicant.